

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

Division

Asad Gilani

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Tenco, Inc.,
Piers Carey

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. AMENDED - 20-CV-1785- MKV-SDA

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

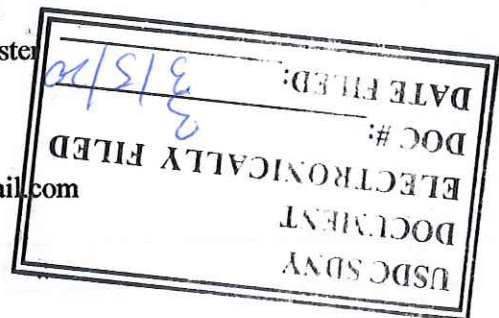
COMPLAINT FOR EMPLOYMENT DISCRIMINATION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	REDACTED
Street Address	661 Bedford Road
City and County	Armonk, Westchester
State and Zip Code	New York, 10504
Telephone Number	914-224-8073
E-mail Address	asad.s.gilani@gmail.com



B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Teneo, Inc.
Job or Title <i>(if known)</i>	C/O RA Business Filing Incorporated
Street Address	44330 MERCURE CIR SUITE 260
City and County	DULLES
State and Zip Code	VA 20166
Telephone Number	(703) 212-3220
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	Piers Carey
Job or Title <i>(if known)</i>	CEO
Street Address	37182 Adam Green Lane
City and County	Middleberg
State and Zip Code	VA 20117
Telephone Number	703-5094875
E-mail Address <i>(if known)</i>	pcarey@teneo.net

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is

Name	44330 Mercure Cir, Ste 260, Dulles VA 20166 - Remote in New York
Street Address	
City and County	661 Bedford Road
State and Zip Code	New York 10504
Telephone Number	914-224-8073

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to (check all that apply):

- ☒ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

- ☒ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)

- ☒ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

- ☒ Other federal law (specify the federal law):

Race

- ☒ Relevant state law (specify, if known):

Retaliation

- ☒ Relevant city or county law (specify, if known):

National Origin

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes *(check all that apply)*:

- ☐ Failure to hire me.
- ☒ Termination of my employment.
- ☒ Failure to promote me.
- ☒ Failure to accommodate my disability.
- ☒ Unequal terms and conditions of my employment.
- ☒ Retaliation.
- ☐ Other acts *(specify)*: _____

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)

August 9, 2018, August 10, 2018 2019, December 22, 2019 January 1 2019, March 8 2019, March 25 2019,

C. I believe that defendant(s) *(check one)*:

- ☐ is/are still committing these acts against me.
- ☐ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my *(check all that apply and explain)*:

- ☒ race Asian
- ☒ color _____
- ☐ gender/sex _____
- ☒ religion Muslim
- ☒ national origin Pakistani
- ☐ age *(year of birth)* 1956 *(only when asserting a claim of age discrimination.)*
- ☐ disability or perceived disability *(specify disability)*
Herniated Disc

E. The facts of my case are as follows. Attach additional pages if needed.

Please see amended complaint

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on (date)

B. The Equal Employment Opportunity Commission (check one):

☐ has not issued a Notice of Right to Sue letter.

☒ issued a Notice of Right to Sue letter, which I received on (date) 11/27/2019.

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (check one):

☐ 60 days or more have elapsed.

☐ less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

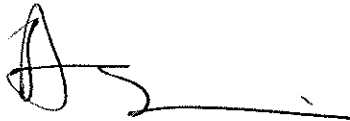
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 3/5/2020

Signature of Plaintiff

Printed Name of Plaintiff Asad Gilani

**B. For Attorneys**

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ASAD GILANI,

Plaintiff,

v.

TENEO, INC,
PIERS CAREY

Defendant.

Case No: 20-VC-1785-MKV-SDA

AMENDED COMPLAINT
JURY TRIAL DEMANDED

Plaintiff Asad Gilani alleges as follows:

NATURE OF THE ACTION

1. This action seeks recovery for violations of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e *et seq.*, the Age Discrimination in Employment Act of 1967, § 2 *et seq.*, 29 U.S.C.A. § 621 *et seq.*, and the New York City Human Rights Law, N.Y. City Admin. Code § 8-107 *et seq.*, based on the willful and illegal employment practices of Defendant, Teneo, Inc. (“Teneo”).

2. This action seeks recovery for violations of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e *et seq.*, the Age Discrimination in Employment Act of 1967, § 2 *et seq.*, 29 U.S.C.A. § 621 *et seq.*, and the New York City Human Rights Law, N.Y. City Admin. Code § 8-107 *et seq.*, based on the willful and illegal employment practices of Defendant, Piers Carey Company (“Carey”).

3. Mr. Gilani joined Teneo on September 2016. Throughout his employment at Teneo, Inc, Mr. Gilani was highly regarded in his field and considered exceptionally qualified in providing SD-WAN and other Technology to Teneo's Clients. Teneo did not criticize Plaintiff's work product or performance. Teneo's Core competency was with Riverbed Product WAN Optimization Technology only. Most of the people in the company has only WAN Optimization Skills learned by Riverbed. In addition, some security products as well as application products.

4. In early August 2016 Mr. Gilani, an expert Skills Assessment was mandated by Teneo, Inc. The expert report was produced on 8/25/16 and states. "Asad bring the following Value to the Organization: 1) People-oriented, 2). Build good relationships., 3) Works for a leader and a cause. 4) Turns confrontation into positives, 5) Flexible, 6) Will gather data for decision making, 7) Concerned about quality, 8). Respect for authority and organization structure, 9) Adaptable

JURISDICTION AND VENUE

4. This Court has original subject matter jurisdiction over Plaintiff's claims under Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e et seq. ("Title VII") and the Age Discrimination in Employment Act of 1967, § 2 et seq., 29 U.S.C.A. § 621 et seq. ("ADEA"), pursuant to 28 U.S.C. § 1331 because it arises under the laws of the United States.

5. The Court has supplemental jurisdiction over Plaintiff's claims under the New York City Human Rights Law, N.Y. City Admin. Code § 8-107 ("NYCHRL") and its implementing regulations pursuant to 28 U.S.C. § 1367, because these claims are so closely

related to Plaintiff's claims under Title VII and the ADEA that they form part of the same case or controversy under Article III of the United States Constitution.

6. Personal jurisdiction over Defendant Teneo, Inc. is proper because Teneo, Inc is licensed to do business in the state of New York and operates within the jurisdiction of the Southern District of New York. Teneo, has engaged, and continues to engage, in continuous, permanent, and substantial activity in New York . Teneo, is licensed to do business in New York and has one or more places of business in this judicial district.

7. Venue is proper in the Southern District of New York pursuant to 28 U.S.C. § 1391(b)-(c) because Teneo, Inc may be found in this district, the events giving rise to the claim occurred in this district, and Teneo. conducts business within this district.

EXHAUSTION OF ADMINISTRATIVE REQUIREMENT

1. Mr. Gilani timely filed charges of race, national origin, religious, age, disability, retaliation and age discrimination with the Equal Employment Opportunity Commission on June 24 2019 and the EEOC duly filed those charges with the New York City Human Rights Commission.

2. On June 26, 2019 Mr. Gilani filed a case with EEOC portal and officially complaint was filed on July 1, 2019 Ex – 1c On November 27, the Equal Employment Opportunity Commission issued Mr. Gilani a Notice of Dismissal and Right to Sue, a copy of which is attached hereto as EX-1. Mr. Gilani did not receive the Right to Sue Letter until December 5th, 2019 – See EX-1a

3. Contemporaneously with the filing of this Complaint, Mr. Gilani has mailed a copy to the New York City Commission of Human Rights and the Office of the Corporation Counsel of the City of New York, thereby satisfying the notice requirements of Section 8-502 of

the New York City Administrative Code.

4. Plaintiff would like Court to know Plaintiff tried to settle the case with Defendant Teneo in good faith. All along Defendant Teneo's Attorney wanted to settle but on February 26, 2020 notified Plaintiff's Attorney not will to settle the case. On February 27, 2020 Plaintiff's Attorney reached out to Defendant Teneo's Attorney that Plaintiff will be filing the case on February 28, 2020, Defendant Teneo's Attorney refused. The Filing Court date was March 1, 2020. Plaintiff being a Pro Se created a complaint in one day and filed the Complaint against Defendant Teneo and Piers Carey on Friday February 28, 2020 at 2:46 p.m. in White Plains, New York.

PARTIES

6. Plaintiff Asad Gilani is an adult individual who resides in Westchester, New York. Mr. Gilani worked Remotely for Defendant Teneo form his Home Office in Armonk, New York.

7. Plaintiff was employed by Defendant from September 26, 2016, through June 28, 2019, when Teneo, Inc unlawfully terminated his employment.

8. Defendant Teneo is a Virginia Corporation and multinational information technology company, with headquarters located in Dulles, Virginia United States. It operates offices all over US and in New York, Plaintiff. Plaintiff worked from home in Armonk, New

FACTS

9. Plaintiff is male that suffers from Herniated Disk injured at Defendant Teneo on September 26, 2017 in Raleigh Durham North Carolina at the customer site.

10. Plaintiff has substantial limitations to his major life activities

11. Plaintiff was formally hired as an employee by Defendant Teneo on September 23, 2016 as a Solution Engineer for New York City. Ex-26, confirms that Plaintiff was a Solution Engineer hired to support Rose Neas in New York Metro.

12. Plaintiff was responsible for supporting pre-sales activities on Riverbed, Palo to Alto and Gigamon product line. Excluding SD-WAN and WAN Optimization. As Plaintiff notified Mr. Steve Evans, he is not interested in WAN Optimization technology on the face-to-face interview in Washington before interviewing in Washington DC.

13. Plaintiff worked remotely from his Home in Armonk, New York for Defendant Teneo

Plaintiff's supervisor, Steve Evans learns of Plaintiff's Disability

14. Gilani's supervisor was an individual, "Steve A (a/k/a "Steve")

15. In PPD's Raleigh Durham Data Center in North Carolina. Mr. Gilani became disabled due to herniated disk.

16. Steve continue to asked Mr. Gilani to travel to Paris with his initial injury. Instant of Teneo proving the accommodation, Teneo forced Mr. Gilani to travel to Paris, France on a Customer Engagement for Schinder Electric Viptela SD-WAN High Level Design Session,

17. Again in on October 10th, 2017 Mr. Gilani was forced to travel to Warsaw Poland for the same customer.

18. Beside Mr. Gilani's Disability Steve Evans forced Mr. Gilani to travel domestically at least 50+ times causing pain and suffering. Mr. Gilani discussed with Steve Evans on 1:1 every month after the Disability occurred that Mr. Gilani requesting accommodation no to Travel as most of the meeting can be done over the Webex, but Mr. Steve Evans refused. Steve Evans "Your Job required to Travel.

19. Mr. Gilani was only hired to travel to New York and New Jersey Tristate Area, Steve Evans and Piers Carey forced Mr. Gilani to travel Globally after the disability accommodation was requested. In addition, multiple over and over Steve Evans Life equipment in my disable condition. In or about March or April of 2018,

20. Mr. Gilani was forced to life and configure equipment for A&O in New Jersey.

21. Mr. Gilani's position was not required to Life any equipment and any time. Ex – 17, "Your position will be a Solution Engineer reporting to Steve Evans in the US Technical Team " is a Pre Sales Position not Professional Services or Managed Services Position. Lifting and supporting Customers like installing equipment were part of Managed Services. In Ex-11 Forcing Mr. Gilani to support Managed Services as well.

22. In in Ex-2 , Mr. Gilani was forced to perform professional services for Customers where Steve said "Very nice work Asad!. All those nights and weekends paid off! This is exactly the kind of result we're looking for. Thanks for your efforts!"

23. At no time Teneo provided me accommodation, if I would not travel, they forced me not only in New York, US and Global. Instant of hiring additional resources for the Managed and Professional services

24. Teneo forced Mr. Gilani like a "Slave Driver " 24 hours seven days a week with overtime. Teneo still have not paid Plaintiff's backpay for working overtime and weekends.

25. On August 9th, 2019 at the Annual Meeting in Washington Mr. Gilani asked Mr. Piers and Mr. Piers stated “We do not pay overtime’

26. Teneo violated American Disability Act (“ADA”) which purohits wrongful termination on employee’s disability and retaliation.

27. On September 26, 2016, Ex – 26, Rachel communicates the Plaintiff’s responsibility Rachel Head states, “Asad will support newly appointed Rose Neas in the New York Metro area

28. Ex – 18, Plaintiff notified to Rachel and Brett that Plaintiffs not to support Globally and will not accept meetings early morning. In addition, Plaintiff requested new Role and Compensation. Received new Role but no Compensation. Plaintiff was told no new Compensation.

29. Ex-18 Brett Ayers is asking Plaintiff “who is asking you to work on non US projects: See Ex -1 20, 21, 22, 23, and 24 Brett Ayers continue to assign non-US projects and forced Plaintiff. The evidence shows. Brett Ayers lied all along.

30. Teneo violated American Disability Act (“ADA”) which purohits wrongful termination on employee’s disability and retaliation.

31. On August 9th, 2019 and again in December 14th, 2019, Plaintiff informed Defendant Piers Carey that Plaintiff was interested in the SD_WAN Practice Lead Position available.

32. On January 1, 2019 Plaintiff was informed that Brett Ayers, a lesser qualified younger white (non-Muslim), British individual was selected as a SD_WAN Practice Lead.

33. Plaintiff alleges that Brett Ayers had no experience needed for the Technology Experience or Degree in Technology and specially in SD-WAN Position, Technical Competency Industry Network Experience and Management of Network.

34. On September 22, 2016 Rachel Head said in New Starter announcement. "Asad held a number of technical and management positions at companies such as Morgan Stanley and Bank of America and has a B.A. in Computer Information and an M.S. in Telecommunications from Iona College, New Rochelle" Dependent accepted Plaintiff had both Technical and Management skill set.

35. Brent had never worked in Networking or in an Enterprise. Brent was an inside Sales person then account executive.

36. Mr. Gilani allege he was not selected because of his race, national origin, religion and age. Ex - 8, confirms that Mr. Gilani's second quarter performance was completed by Steve Evans and Brett Ayers did not start the position until January 1, 2019 as a SD_WAN Practice Lead.

37. Below Ms. Head accepted that Brey Ayers was not qualified for the position and Mr. Gilani was more qualified for the SD-WAN Practice Lead Position.

38. But Piers Carey discriminated against Mr. Gilani because he was older Pakistani, Muslim and from South Asian

39. When Plaintiff met over the phone with Rachel Head and discussed all the discrimination charges this was one of the charges and she ignored it intentionally and

40. In June and July of 2019, Piers Carey instituted a policy if four Sales Executives make the 100 percent quota Piers Carey will open a CEO Club. One of the criteria

was who sold the most SD-WAN. The Sales Executive and Sales engineer will go to the CEO Club in Iceland with wife.

41. On June 29, 2018 Roy Wieland – Senior Director – Enterprise Accounts – support CEO Nomination Club - Asad Gilani EX – 4. Roy and Plaintiff sold most of the successful SD-WAN in the history of Teneo. On June 9th, 2018 Roy Wieland states “Asad helped me close and deliver our first THREE SD-WAN Deals at Cox Media Group, LPL Financials and Hope Shopping Networks” These deals included heavy services at great margins. All customers are happy and will be future references for Teneo. ... A fine job for which he should be appropriately recognized”

42. On July 18, 2018 EX-3 Peter Thornhill VP – Enterprise Accounts at Teneo send email stating “I thought I would drop you a quick note about Asad’s recent contribution to my projects at Teneo and to personally recommend Asad to be nominated for the CEO club this year. The recent projects Asad has managed include” 1) BD – SD-WAN, Data Center migration, Steel Connect, 2) Bechtel – Viptela PoC, Hyster Yale – VeloCloud/Silver Peak and PPD – Dynatrace PC for CTMS. Asad has been deeply committed to provide my customers with support and consultative approach to their specific business needs. Despite the overwhelming amount of work that Asad has to do, he consistently finds ways to talk the time to provide valuable updates on my projects”.

43. On July 20, 2018 John Stranton Account Executive – Ex – 18b states “Recommendation for Iceland to Piers Carey – Asad Gilani has done a very fine job with especially the Unites Airlines SDWAN professional project scope and among

other projects. He is putting in great diligence and effort on this services project and spent numerous hours for the trip to Iceland since there may be ours helping out with planning and he has put forth great efforts. With this said, I want to nominate Asad as a candidate for the trip to Iceland since there may be potential spots available. Thanks to Asad for all of his efforts this past year”

44. On 10th of August, 2018 the Solution Candidates was announced. Mr. Gilani was the only Solution Engineer who sold SD-WAN over 4 million but the nomination was denied to Mr. Gilani based on Race, Religion, Age and National Origin. The Candidate selected who had never sold one SD-WAN, White not Muslim and younger in age. Mr. Gilani was discriminated by Piers Carey and Teneo based on Race, Religion, Age and National Origin

45. On or about February 10th, 2018 on a call with Brett Ayers and another engineer from UK, Roman. On the Conference call Roman started shouting at me and harassing me. I notified Brett Ayers that this is harassment and against me and it is hostile work environment and is not acceptable

46. On or about February 10th, 2018 on a call with Brett Ayers and another engineer from UK, Roman. On the Conference call Roman started shouting at me and harassing me. I notified Brett Ayers that this is harassment and against me and it is hostile work environment and is not acceptable

47. On or about February 26, 2018 again we were on the call and Roman start shouting at me over the phone. Mr. Gilani notified again to Brett Ayers that this hostile work environment is not acceptable against and against me and it is hostile work environment and is

not acceptable. Against Mr. Gilani. Mr. Gilani told again to Brett Ayers about the discrimination but Brett Ayers did not take any action. To stop the harassment against Plaintiff and foster harassment against Plaintiff on the bases of Race, Age and National Origin.

48. On September 26, 2016, Ex – 26, Rachel communicates the Plaintiff's responsibility Rachel Head states, "Asad will support newly appointed Rose Neas in the New York Metro area

49. Ex-18 Brett Ayers is asking Plaintiff "who is asking you to work on non US projects: See Ex -1 20, 21, 22, 23, and 24 Brett Ayers continue to assign non-US projects and forced Plaintiff. The evidence shows. Brett Ayers lied all along

50. On March 9th, 2018 Brett Ayers cancelled 1:1 was cancelled and on March 10th, Brett Ayers got on the call with Plaintiff with Steve Evans and start shouting at Plaintiff over the call. Mr Plaintiff states " You are the most highly paid SD WAN Engineer in the company and you have to take support Globally period." Plaintiff response please "STOP SHOUTING I AM NOT A DOG OR YOUR SLAVE". Mr Ayers stopped shouting but said Plaintiff has to support Globally.

51. On March 9th, 2018 Conference Call with Brett Ayers and Steve Evans Plaintiff stated first of all Plaintiff called out, Plaintiff was only hired to support New York Area Ex – 18, Plaintiff notified to Rachel and Brett that Plaintiffs not to support Globally and will not accept meetings early morning. In addition, Plaintiff requested new Role and Compensation. Received new Role but no Compensation. Plaintiff was told no new Compensation.

52. On March 9th, 2018 Steve said you have to work Globally Plaintiff mentioned you have to provide compensation and document role. Ex – 18a does not indicate that I have to support Globally

53. Plaintiff told both Steve Evans and Brett Ayers no one in the Company supporting Globally, they are all tied to Account executives and you are discriminating against Plaintiff based on Race and because he is old forcing Plaintiff to resign because of Age, Color and National Origin. Steve Evans knew that discrimination has been occurred and Plaintiff told Steve Evans but he refused to take any action against Brett

54. In or around February 2019, Mr Gilani asked to attend Cisco Conference in San Diego. Brett Ayers denied Cisco training needed for the job. Mr. Gilani was again denied training situated individuals (Adam Start, Roman Dounkov, and Dan Sobel), all outside his protected class, received training. Mr. Gilani alleges that Mr. Piers Carey denied his training on the basis of his race, religion, national origin and age.

55. In February 2019, Mr. Ayers inexplicably denied Mr. Gilani Cisco training that was necessary for Mr. Gilani's position. Yet, Mr. Gilani later learned that Mr. Ayers attended such trainings himself and approved Mr. similarly situated peers – Romain Doukov, Adam Start, himself and Dan Sobel

56. Undertake additional training. Mr. Doukov, Mr. Start, and Mr. Sobel, like Mr. Ayers, are younger, White, and not Muslim or Pakistani. The environment under Mr. Ayers was also hostile towards Mr. Gilani

57. On June 18, 2019, On a call with Silver Peak, Road map Call, Plaintiff found out that Brett Ayers and Dan Sobel were schedule to attend the training in California denying Training to Plaintiff.

58. On June 18, 2019 Plaintiff filed EEOC Complaint of Discrimination against Teneo Inc. and notify Rach Head. Ex – 10P5

59. Dan Sobel were schedule to attend the training in California denying Training to Plaintiff.

60. On June 18, 2019 Plaintiff filed EEOC Complaint of Discrimination against Teneo Inc. and notify Rach Head because Plaintiff had been discriminated against race color, age and religion

61. or bout on March 8th, 2019 Mr. Ayers requested Mr. Gilani to support Global projects getting up early in the morning No other one were required to support project Globally. In Ex – 18, My Ayers asking “ who is requesting you to work on non-us projects” but assigning but forced me to work on global projects. On or about March Steve Evans and Brey Ayers got on the call with Mr. Gilani and start shouting at Mr. Gilani that “ You are the highest paid and you you have to support Global project’ Mr. Gilani responded he was only hired for Us project specially for New York

62. On or about March 29, 2019, Dan Sobel began to yell at Plaintiff and said that he was from a red neck. He referred to my religion calling me a Muslim. He also called me a Paki

63. As stated, above Ms. Head accepted that this is not comfortable situation actually Ms. Head accepted that Discrimination against Mr. Gilani occurred as a Muslim and Pakistani and calling himself a Redneck. Ex – 10P2-P4

64. As stated, above Ms. Head accepted that this is not comfortable situation actually Ms. Head accepted that Discrimination against Mr. Gilani occurred as a Muslim and Pakistani and calling himself a Redneck

65. Mr. Gilani worked as Solution Engineer for Teneo starting in September of 2016. He worked for Clients supporting Cisco, VMware, Silver Peak, Meraki and Steel connect SD-WAN and other technologies through his unlawful termination on June 28, 2019 was a pre-text

66. Mr. Gilani has over thirty-five years of experience in engineering and information technology. Mr. Gilani has helped design several of the largest computer networks in the world while holding positions at multiple large companies, including Morgan Stanley, Merrill Lynch, Dean Witter Reynolds, and CIGNA Healthcare. He also has expertise in cybersecurity and worked in networking and security for International Network Services, British Telecom, and Booz Allen Hamilton. Overall Mr. Gilani was qualified for his position

67. Plaintiff supporting Cisco, VMware, Silver Peak, Meraki and Steel connect SD-WAN and other technologies through his unlawful termination on June 28, 2019 was a pre-text

68. In Ex – 2 – shows Steve Evans appreciation of Mr. Gilani's work at LPL Financials. "Very nice work Asad All those nights and weekends paid off!. This is exactly the kind of results we're looking for. Thanks for your efforts.

69. In Ex – 3 – Peter Thornhill Mr. Gilani's CEO Club's Nomination " Asad' recent contribution to my projects and to Teneo and to personally recommended Asad to be nominated for the CEO club this year. CEO Club's Nomination " Asad' recent contribution to my projects and to Teneo and to personally recommended Asad to recent contribution to my projects and to Teneo and to personally recommended Asad to be nominated for the CEO club this year.

70. Mr. Gilani began working for Teneo in September 2016 and excelled in his role as a Solutions Engineer.

71. In Mr. Gilani's 2018 performance review, his most recent annual performance review, Teneo rated him as a 3.7 out of 4.0 and provided him with a four percent salary increase for his strong performance.

72. In Ex 7 – 2019 first Quarter Performance Review by Steve Evans. In his most quarterly performance review, for the second quarter of 2019, Mr. Gilani scored a perfect 3.8 out 4.0 exceeding expectations

73. In Ex 8 – 2019 second Quarter Performance Review by Steve Evans. In his most quarterly performance review, for the second quarter of 2019, Mr. Gilani scored a perfect 3.8 out 4.0 exceeding expectations.

74. In Ex 8 – 2019 recent Quarter Performance Review by Steve Evans. In his most quarterly performance review, for the third quarter of 2019, Mr. Gilani scored a perfect 4.0 out 4.0 exceeding

75. In Ex 9 – 2019 first Quarter Performance Review by Brett Ayers. Since Mr. Gilani joined Teneo in September 2016 his performance exceeded the expectations as noted above. Mr. Gilani was qualified for the position and was performing and exceeding expectation

76. In Ex - 4 Roy Wieland "I would like to express my full support and nomination for Asad Gilani to attend the CEO Club. Asad helped me close and deliver our first THREE SD-WAN Deals at COX Media Group, LPL Financials, and Home Shopping Networks. These deals included heavy services at great margins.... All customers are happy and will be further reference for Teneo... A fine job for which he should be appropriately recognized." Ex- 5 another customer recommendation. Mr. Gilani was qualified for the position at Teneo and exceeding the expectation.

77. After Plaintiff's termination, Plaintiff requested his Performance from Rachell head, first it took her over one month to send Plaintiff's performance reports. First Rachel email Plaintiff the performance reports in Excel format then later in PDF format. Plaintiff Attorney had already requested Legal hold on any of the documents in Defendants Teneo position back in September 2019

78. June 18, 2019 at just before the Silver Peak Steve Evans called Plaintiff and complaint that one Account executive Greg Spraggins was unhappy he did not won the Whirlpool because of Plaintiff/ Silver Peak Deal . was upset after two month of losing Whirlpool deal. Defendant is very Sneaky Plaintiff stated SD-WAN is not a matured like WAN Optimization and Whirlpool did the Analysis and found lack of Silver Peak SD-WAN. This is a Pre-Text to avoid Discrimination Charges set forth by Plaintiff on the Race, Age, National Origin.

79. The Site Visit was on April 23, 2019 and the findings were give to the Defendant and Silver Peak were on the May 19, 2019 attempt to justify its termination of Mr. Gilani's employment is pretextual: Allegedly making Silver Peak Partner upset. On June 18, 2019 – just a pre-text.

80. Defendant's attempt to justify its termination of Mr. Gilani's employment is pretextual: Allegedly making Gregg Soraggins is upset he did not won the deal . The Selection process of SD-WAN was done by a Network Architect in Whirlpool not Teneo or Plaintiff. Plaintiff was only involved a week before the findings and a site visit. See Ex – 16 on May 17, 2019. Whirlpool had a call in where Silver Peak and Teneo sat in and Whirlpool provided the findings:

81. The evidence indicates “At the most you know, Teneo and Silver Peak were in the running at Whirlpool for their SDWAN solution, Eric Schlutt, the Whirlpool Network Architect and one of the key decision makers, was gracious enough to have a conference call today to discuss their organization SDWAN selection criteria and the vendor chosen. He was not at liberty to flat-out discuss the winning OEM/vendor but based on the information gathered from the call, a Velocloud was selected. The customer did not select silver Peak because

- i. 1) Orcastrator UI was cumbersome, not as intuitive and needs simplification making various settings easier to locate. as other solutions,
- ii. 2) Tunnel creation to the sites and to the cloud locations (AWS, GCP) not streamlined as other solutions
- iii. 3) The HA design was not as developed as other solutions and turn-up was more difficult then should have been. It took too long to get the HA site into the running stage
- iv. , 4) not as scalable as other solution, i.e: intra-region contract were lacking. The term Roadmap was unacceptable
- v. 5). The customer evaluated the product was not ready for them and they selected the Velo Cloud Solution

82. Plaintiff never met the customer before... Why would Silver Peak was upset because customer did not select their product, It is normal. They should take the feedback and fix the issues for next customer. This is a pre-text defendant wanted to avoid the discrimination charges based on Age, Religion, National Origin

83. This was all Pre-Text and wrongful termination to avoid discrimination charges against Plaintiff on the bases of Age, Religion, National Origin Due to the Technical Expertise of Plaintiff, Plaintiff identified the same issue early on and notify Defendant they should not have wasted time in this engagement back in April 15, 2019 two months prior to Plaintiff's termination, Steve Evans were on the Site Visit and it is amazing.

84. Mr. Gilani will charge charter deformation against Silver Peak and Defendant.

85. Teneo replaced Mr. Gilani in New York with a Solution Engineer who is younger, white and non-Muslim.

86. When Nick Malone joined Teneo on End of May or beginning of June 2019 he stole all the contacts from Gardner and provided to Defendant as their customer. Defendant hires and foster obtaining customer contact and them firing them as Defendant did to Nick Malone. This is Defendant usually normal business operations. In Ex-10 Page 11 review Nick Malone and Steve Warbeck's conduct and CORUT should determine their credibility. Defendant maintained had no control in their culture and Hostile Work Environment and abusive.

87. On June 28,m 2019 Defendant Steve Evans told Plaintiff that both Nick Malone and Steve Webreck called out about Plaintiff's had issue with both Lindsey Claypool - Directory of Channel US & Canada at Riverbed . Both Nick and Steve are very junior Sales people and since Nick Malone left Teneo with 5 months of his Role in New York City.

88. On June 20, 2019 Plaintiff received an invite from Riverbed technical Team to provide a presentation to Global SE about a Versa SD -WAN. See Ex – 24 Patrick requested to Plaintiff "Thanks Asad! Would you be open to sharing some of your real-world Versa tips/trick and experiences on a call whith the Riverbed SE team? It would be a huge help to our field team, as well as position Teneo to be a partner of choice in some new opportunities with Versa"

89. On June 20, 2019 in Ex_24 Plaintiff response Sure Patrick have a call. Let me know when”

90. On June 20, 2019 Plaintiff forwarded the same email to Rach Head Platiff stating “Rachel I am bringing Reverbed/Versa opportunities to Teneo and messages Steve Evans or is giving out is very different. I just can not believe it”

91. This was a wrongful termination as Mr. Gilani denied it and pre-text: . In Ex 7, 8, 9 Performance Review there was no mention of three projects Imperva, Sedgwick and Whirlpool. I was brought in because Defendant failed the sold managed service at Imperva and Sedgwick in 2016 sold product which was not implemented with two years. The Silver Peak SD-WAN to Whirlpool where customer did the evaluation of the product and did not select Silver Peak. It is pre-text of Discrimination and avoiding liability.

92. On June 26, 2019, you and Steve Evans, Teneo’s Vice President of Solutions Engineering, informed Mr. Gilani via a telephone call that Teneo’s internal investigation did not conclude that the company discriminated against Mr. Gilani. The result was unsurprising given that that Teneo’s investigation lasted less than a week and was limited to cursory conversations with a few select people rather than a thorough examination of Mr. Gilani’s complaints. During that same call, Rachel and Steve Evans informed Mr. Gilani that Teneo was terminating Mr. Gilani’s employment. The only explanation provided for the termination of Mr. Gilani’s employment was that Mr. Gilani purportedly had made damaging statements to key partners on a call - a call that never took place between plaintiff and Riverbed and Plaintiff and Silver Peak

93. Teneo terminated Mr. Gilani on August 26, 2019 and the reason was given Ex –

10P15

94. Plaintiff would like to point out, how Defendant changed the tune from what Steve Evans told me on June 18, 2019 and what is on the termination call. Total Contradiction of Defendant own word to avoid Discrimination was a pre-text of wrongful termination was a Pre-Text

95. Defendant's attempt to justify its termination of Mr. Gilani's employment is pretextual: Allegedly making Riverbed Partner upset, defendants' reason is a pre-text for retaliation. Teneo developed a Managed Service using Riverbed Steel Connect SD-WAN product. Mr. Gilani was not part of this service and he was given this project because supporting SD-WAN Engineer left Teneo Inc. The project was given to Plaintiff to support, on a first day in the project Ex - 11 receives an email addressed to both to Teneo Managed Services and Riverbed by a managed service customer with three sites *"Embarrassing, in 30 years in I, have not seen such an incompetence or a total disregard of a foundational system and a service provider. Everyone in Teneo and Riverbed should be ashamed of themselves."* When Plaintiff called out is what Teneo calls Managed Services? The email was addressed to Steve Evans and was the reflection of Teneo and Steve Evans Technical Skills. Teneo is a Value-Added Reseller not a Networking Consulting Company. Riverbed does not sell directly, it sells thru pass thru partners. Teneo's Business performance is tiered to Riverbed performance. Riverbed asked Teneo to quote and sell as SD-WAN Steel Connect in 2016 and sold Steel Connect to a company in Memphis, TN for over 1 Million Dollars. This includes providing the services and WAN Optimization. The

same Engineer who supported on the Manage Service SD-WAN supported this account.

96. Ex – 12 On May 18, 2019 Steve Evans requested Plaintiff's help in this account.

Steve Evans accepted that Teneo had no understanding of the product what they were selling to the customer. Steve Evans said that he will join the calls and if the customer comes back to the decision to proceed to any other solution that will be fine. This means Steve Evans accepted that Teneo sold the product which does not work.

97. In Ex – 13 On 4. 24. 2019 a communication between Plaintiff and Steve Evans

shows that the product is so bad that Steve Evans calls "this sounds ugly" Steve

Evans eluding to the Riverbed Steel Connect Product.

98. Ex-14 On May 31, 2019 customer asked Plaintiff his thoughts and Plaintiff said he

can understand the pain for two years. Teneo. , Steve Evans, Piers Cary and

Riverbed sold the product which were not deployable in two years and impacting the

business. Plaintiff would say Teneo and Riverbed was responsible selling a bad

product to the customer with Riverbed. It was not Plaintiff who sold the product to

the customer it was Piers Cary and Steve Evans sold the product to the customer.

Customer came back to Riverbed and asked to return the product because it was not

implementable. Instant of Teneo taking responsibility and telling Riverbed Product

and tried to blame Plaintiff.

99. Ex-14 Steve Evans " Hopefully SteelConnect will work for them, please keep us

updated. I read through the FIS presentation and they are definitely trying to cover

themselves but it wont matter for them. They are on the outs. But this is our time to

shine”” Steve Evans and Piers Carey sold them the bad product why are they blaming the FIS. Wishful thinking

100. Ex -15 Page 2, Mr. Gilani stated “ Sedgwick: What I told them that steel Connect does not work. When you were on the call with Sedgwick you said yourself in Ex – 13 that this was ugly.... Should have not sold the product without understanding if the product works. Justin was on the project until last November. That was Teneo’s decision not mine”

101. Mr. Gilani will charge character deformation against Teneo instant of blaming themselves blaming Plaintiff.

102. Teneo replaced Mr. Gilani Solution Architect with younger white non-Muslim Solution Engineer

103. On June, 18 2019, Mr. Gilani was engaged in a protected activity when he told Rachel Head that he was meeting with EEOC, He was terminated on or around June 27, 2019 for allegedly making a partner upset which is pre-text for retaliation.

104. In February 2019, Mr. Ayers inexplicably denied Mr. Gilani Cisco training that was necessary for Mr. Gilani’s position. Yet, Mr. Gilani later learned that Mr. Ayers attended such trainings himself and approved Mr. Gilani’s similarly situated peers – Roman Doukov, Adam Start, and Dan Sobel – t to undertake additional training. Mr. Doukov, Mr. Start, and Mr. Sobel, like Mr. Ayers, are younger, White, and not Muslim or Pakistani. The environment under Mr. Ayers was also hostile towards Mr. Gilani and on or about March 29, 2019, Dan Sobel , like Mr. Ayers, are younger, White, and not Muslim or Pakistani. The environment under Mr. Ayers was also hostile towards Mr. Gilani and on or about March 29, 2019, Dan Sobel yelled at and

berated Mr. Gilani, referencing Mr. Gilani's Muslim faith and calling Mr. Gilani a "Paki," a derogatory shorthand reference to an individual of Pakistani national origin. Mr. Sobel explained his hostile behavior towards Mr. Gilani by saying that he (Mr. Sobel) was a "redneck".

105. On or about on March 8th, 2019 Mr. Ayers requested Mr. Gilani to support Global projects getting up early in the morning. No other one were required to support project Globally. In Ex – 18, My Ayers asking " who is requesting you to work on non-us projects" but assigning but forced me to work on global projects. On or about March Steve Evans and Brey Ayers got on the call with Mr. Gilani and start shouting at Mr. Gilani that " You are the highest paid and you you have to support Global project' Mr. Gilani responded he was only hired for Us project specially for New York.

106. On June 18, 2019, Mr. Gilani informed you, as Teneo's Vice President of Human Resources, that in response to Teneo's discriminatory treatment, he was filing a charge of discrimination with the Equal Employment Opportunity Commission. On June 19, 2019, you asked Mr. Gilani to speak with you about his allegations, and Mr. Gilani requested that the parties.

107. The facts strongly suggest that Teneo unlawfully discriminated against Mr. Gilani by denying his promotion to the SD-WAN Practice Lead position and denying him opportunities provided to younger, White, non-Muslim employees, and that Teneo further discriminated and retaliated against Mr. Gilani by terminating his employment only days after he notified notified Teneo that he was filing a charge of discrimination with the Equal Employment Opportunity Commission. Such close

temporal proximity between Mr. Gilani's protected conduct and the termination of his employment is powerful proof of retaliatory animus. *See Parker v. Workmen's Circle Ctr. of the Bronx, Inc.*, No. 14 Civ. 5237, 2015 WL 5710511, at *5 (S.D.N.Y. Sept. 29, 2015) ("[I]t is well established in the Second Circuit that temporal proximity is indicative of a causal connection between a protected activity and an adverse employment action."); *Gorzynski*, 596 F.3d at 111 (holding that a four-month period between plaintiff's complaint and termination is sufficient to infer a causal connection for retaliation under the ADEA). This is especially true where the reason provided for the termination, as here, is wholly unsubstantiated, unspecified, and without any prior warning or reprimand for the alleged misconduct at issue

108. Finally, Defendant in or about September 2019 hired a White Non-Muslim, younger male to replace a Solution Engineer in New York. The Defendant's intention to remove Older Pakistani Muslim and hire a younger, White, non-Muslim

109. Plaintiff never said that Plaintiff had spoken to Defendant Riverbed and Defendant Silver Peak any damaging relations. Defendant Teneo has defamed, Plaintiff reputation falsified injurious, accusing Plaintiff. Defendant Teneo had caused harm to Plaintiff by falsifying statements and caused harm to Plaintiff's character and harmed to avoid Discrimination Chagres. Defendant has committed a serious, notorious and immoral crime against Plaintiff

CAUSE OF ACTION

**FIRST CAUSE OF ACTION:
(Discrimination Because of National Origin and Religion)
(Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.*)**

6. Plaintiff Asad Gilani repeats and re-alleges each and every allegation in the aforementioned paragraphs.

7. Defendant, Teneo, violated Title VII of the Civil Rights Act of 1964 when it discriminated against Mr. Gilani in the terms and conditions of his employment and terminated his employment because of his national origin and religion. 42 U.S.C. § 2000e-2(a)(1). In doing so, the Defendant acted maliciously to interfere with Mr. Gilani's right to be free from discrimination based on national origin and religion.

8. Defendant's attempt to justify its termination of Mr. Gilani's employment is that Mr. Gilani made partners upset is not related which is pre-textual. Despite favorable reviews of Mr. Gilani's work over the prior four months and without prior disciplinary action Defendant terminated Mr. Gilani soon after learning about his religion and national origin.

9. Mr. Gilani was treated differently than the rest of his coworkers who are younger and are not Pakistani Muslim. Teneo did not terminate the employment of the other individuals who failed to provide those individuals with warnings and opportunities to correct their behavior.

10. Mr. Gilani is entitled to damages as a result of Defendants' unlawful acts, including past and future lost wages and benefits, damages to compensate him for past and future physical and emotional distress, punitive damages, reasonable attorneys' fees and costs of this action.

CAUSE OF ACTION

**SECOND CAUSE OF ACTION:
(Discrimination Because of National Origin and Religion
Denying Promotion)
(Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.*)**

6. Plaintiff Asad Gilani repeats and re-alleges each and every allegation in the aforementioned paragraphs.

7. Defendant, Teneo, violated Title VII of the Civil Rights Act of 1964 when it discriminated against Mr. Gilani in the terms and conditions of his employment and terminated his employment because of his national origin and religion. 42 U.S.C. § 2000e-2(a)(1). In doing so, the Defendant acted maliciously to interfere with Mr. Gilani's right to be free from discrimination based on national origin and religion. Denying promotion as SD-WAN Lead

8. Defendant's attempt to justify its termination of Mr. Gilani's employment is that Mr. Gilani made partners upset is not related which is pre-textual. Despite favorable reviews of Mr. Gilani's work over the prior four months and without prior disciplinary action Defendant terminated Mr. Gilani soon after learning about his religion and national origin.

9. Mr. Gilani was treated differently than the rest of his coworkers who are younger and are not Pakistani Muslim. Teneo did not terminate the employment of the other individuals who failed to provide those individuals with warnings and opportunities to correct their behavior.

10. Mr. Gilani is entitled to damages as a result of Defendants' unlawful acts, including past and future lost wages and benefits, damages to compensate him for past and future physical and emotional distress, punitive damages, reasonable attorneys' fees and costs of this action.

CAUSE OF ACTION

**THIRD CAUSE OF ACTION:
(Discrimination Because of National Origin and Religion – Retaliation)
(Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.*)**

6. Plaintiff Asad Gilani repeats and re-alleges each and every allegation in the aforementioned paragraphs.
7. Defendant, Teneo, violated Title VII of the Civil Rights Act of 1964 when it discriminated against Mr. Gilani in the terms and conditions of his employment and terminated his employment because of his national origin and religion. 42 U.S.C. § 2000e-2(a)(1). In doing so, the Defendant acted maliciously to interfere with Mr. Gilani's right to be free from discrimination based on national origin and religion Retaliation and creating Hostile Work Environment
8. Defendant's attempt to justify its termination of Mr. Gilani's employment is that Mr. Gilani made partners upset is not related which is pre-textual Despite favorable reviews of Mr. Gilani's work over the prior four months and without prior disciplinary action Defendant terminated Mr. Gilani soon after learning about his religion and national origin.
9. Mr. Gilani was treated differently than the rest of his coworkers who are younger and are not Pakistani Muslim. Teneo did not terminate the employment of the other individuals who failed to provide those individuals with warnings and opportunities to correct their behavior.
10. Mr. Gilani is entitled to damages as a result of Defendants' unlawful acts, including past and future lost wages and benefits, damages to compensate him for past and future physical and emotional distress, punitive damages, reasonable attorneys' fees and costs of this action.

CAUSE OF ACTION

FOURTH CAUSE OF ACTION:
(Discrimination Because of National Origin and Religion – Hostile Work environment)
(Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.*)

6. Plaintiff Asad Gilani repeats and re-alleges each and every allegation in the aforementioned paragraphs.

7. Defendant, Teneo, violated Title VII of the Civil Rights Act of 1964 when it discriminated against Mr. Gilani in the terms and conditions of his employment and terminated his employment because of his national origin and religion. 42 U.S.C. § 2000e-2(a)(1). In doing so, the Defendant acted maliciously to interfere with Mr. Gilani's right to be free from discrimination based on national origin and religion creating Hostile Work environment.

8. Mr. Gilani was treated differently than the rest of his coworkers who are younger and are not Pakistani Muslim. Teneo did not terminate the employment of the other individuals who failed to provide those individuals with warnings and opportunities to correct their behavior.

9. Mr. Gilani is entitled to damages as a result of Defendants' unlawful acts, including past and future lost wages and benefits, damages to compensate him for past and future physical and emotional distress, punitive damages, reasonable attorneys' fees and costs of this action.

FIFTH CAUSE OF ACTION
(Discrimination Because of Age)
Age Discrimination in Employment Act of 1967, 29 U.S.C.A. § 621 *et seq.*,

38. Plaintiff Asad Gilani repeats and re-alleges each and every allegation in the aforementioned paragraphs.

39. Defendant, Teneo, violated the Age Discrimination in Employment Act of 1967 when it discriminated against Mr. Gilani in the terms and conditions of his employment and because of his age. 42 U.S.C. § 2000e-2(a)(1). In doing so, Defendant acted maliciously to interfere with Mr. Gilani's right to be free from discrimination based on age.

40. Mr. Gilani is entitled to damages as a result of Defendants' unlawful acts, including past and future lost wages and benefits, damages to compensate him for past and future physical and emotional distress, punitive damages, reasonable attorneys' fees and costs of this action.

**SIXTH CAUSE OF ACTION:
(Discrimination Because of National Origin, Religion, and Age)
New York City Human Rights Law, N.Y. City Admin. Code § 8-107 *et seq.***

41. Plaintiff Asad Gilani repeats and re-alleges each and every allegation in the aforementioned paragraphs.

42. Defendant, Teno, violated the NYCHRL when it discriminated against Mr. Gilani in the terms and conditions of his employment and terminated his because of his national origin, religion, and age. N.Y. City Admin. Code § 8-107 *et. al.* In doing so, Defendant acted maliciously to interfere with Mr. Gilani's right to be free from discrimination based on national origin, religion, and age.

43. Mr. Gilani is entitled to damages as a result of Defendants' unlawful acts, including past and future lost wages and benefits, damages to compensate him for past and future physical and emotional distress, punitive damages, reasonable attorneys' fees and costs of this action.

44. WHEREFORE, Plaintiff respectfully requests that this court enter a judgment:

- (a) Declaring that the acts, practices, and omissions complained of herein are in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.*; and finding that Defendant violated the legal obligation to maintain a workplace free of discrimination on the basis of national origin and religion.
- (b) Declaring that the acts, practices, and omissions complained of herein are in violation of Age Discrimination in Employment Act of 1967, 29 U.S.C.A. § 621 *et seq.*; and finding that Defendant violated the legal obligation to maintain a workplace free of discrimination on the basis of age.
- (c) Declaring that the acts, practices, and omissions complained of herein are in violation of New York City Human Rights Law, N.Y. City Admin. Code § 8-107 *et seq.*, and finding that Defendant violated the legal obligation to maintain a workplace free of discrimination on the basis of national origin, religion, and age.
- (d) Directing Defendant to pay Plaintiff actual damages and otherwise make Plaintiff whole for the full amount of pay Plaintiff would have received but for Defendant's discrimination, including but not limited to past and future lost wages

and benefits, damages to compensate him for past and future physical and emotional distress, punitive damages, reasonable attorneys' fees and costs of this action.

JURY DEMAND

45. Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiffs demand a trial by jury in this action.

Dated: New York, New York
March 5, 2020



Respectfully submitted,



EXHIBIT – 1

EEOC Form 161 (11/16)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: Asad Gilani
661 Bedford Road
Armonk, NY 10504

From: Washington Field Office
131 M Street, N.E.
Suite 4NW02F
Washington, DC 20507



On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

520-2019-04389

Magda Gomez,
Investigator

(202) 419-0733

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

On behalf of the Commission

Enclosures(s)



Mindy E. Weinstein,
Acting Director

NOV 27 2019

(Date Mailed)

cc:

Rachel Head
Vice President of Human Resources
TENE0 INC.
44330 Mercure Circle
Sterling, VA 20166

Cara Greene
OUTTEN & GOLDEN
685 Third Ave.
25th Floor
New York, NY 10017

EXHIBIT 1A

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: _____ Agency(ies) Charge No(s): 520-2019-04389 <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC	
New York State Division Of Human Rights and EEOC <i>State or local Agency, if any</i>			
Name (indicate Mr., Ms., Mrs.) Mr. Asad Gilani		Home Phone (914) 224-8073	Year of Birth 1956
Street Address City, State and ZIP Code 661 Bedford Road, ARMONK, NY 10504			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name TENEO, INC		No. Employees, Members	Phone No.
Street Address City, State and ZIP Code 44330 Mercure Circle, STERLING, VA 20166			
Name		No. Employees, Members	Phone No.
Street Address City, State and ZIP Code			
DISCRIMINATION BASED ON (Check appropriate box(es).) <input checked="" type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input checked="" type="checkbox"/> RELIGION <input checked="" type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input checked="" type="checkbox"/> AGE <input checked="" type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest 01-01-2019 06-27-2019 <input type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)). <p>I. I was hired by Respondent on or about September 26, 2018 as a Solutions Engineer. I worked remotely from my home in New York. I allege I was subjected to unlawful discrimination on the basis of my race, (Asian-Middle East), national origin (Pakistan) religion (Muslim), age (63), disability, and retaliation. Respondent denied me promotion and training. I was subjected to harassment on the basis of my race, national origin, and religion. I was denied a reasonable accommodation for a disability that Respondent was aware of. I was discharged for engaging in a protected activity.</p> <p>II. In July 2018 and again in December 2018, I informed Respondent's Chief Executive Officer that I was interested in the SD-WAN Practice Lead Position available. In January 2019, I was informed that Brett Ayers, a lesser qualified younger white, (non Muslim), British individual was selected. I allege that he has no experience needed for this position. I allege I was not selected because of my race, national origin, religion, and age.</p> <p>III In or around February 2019, I was asked for and was denied cisco training needed for the job. I was again denied training on or around June 18, 2019. I allege similar situated individuals (Adam Start, Roman Doukov, and Dan Sobel), all outside of my protected class, received training. I allege Respondent denied me training on the basis of my race, religion, national origin, and</p>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY – When necessary for State and Local Agency Requirements	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	
Digitally signed by Asad Gilani on 07-01-2019 12:56 PM EDT			

EEOC Form 5 (11/09)

<p align="center">CHARGE OF DISCRIMINATION</p> <p>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</p>	<p>Charge Presented To: Agency(ies) Charge No(s):</p> <p><input type="checkbox"/> FEPA 520-2019-04389</p> <p><input checked="" type="checkbox"/> EEOC</p>
<p align="center">New York State Division Of Human Rights and EEOC</p> <p align="center"><i>State or local Agency, if any</i></p>	
<p>age.</p> <p>IV. In or around February 2019, Respondent required me to lift computers. Respondent was at all times aware of my disability accommodation indicating that I could not lift. Despite this knowledge Respondent continued to require me to lift computers.</p> <p>V. On or around March 29, 2019, Dan Sobel began to yell at me and said that he was a red neck. He referred to my religion calling me a Muslim. He also called me a Paki.</p> <p>VI. On June 25, 2017, I engaged in a protected activity when I told Rachel Head (Human Resources) I was meeting with the Equal Employment Opportunity Commission (EEOC). I was terminated on or around June 27, 2019 for allegedly making a partner upset. Respondent's reason is pre-text for retaliation.</p> <p>VII. I allege I was subjected to discrimination on the basis of race, national origin, religion, age, disability, and retaliation in violation of Title VII of the Civil Rights Act of 1964, as amended, the Americans with Disabilities Act of 1990, as amended and the Age Discrimination in Employment Act of 1967, as amended.</p>	

<p>I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.</p>	<p>NOTARY – <i>When necessary for State and Local Agency Requirements</i></p>
<p>I declare under penalty of perjury that the above is true and correct.</p> <p align="center">Digitally signed by Asad Gilani on 07-01-2019 12:56 PM EDT</p>	<p>I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.</p> <p>SIGNATURE OF COMPLAINANT</p> <p>SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)</p>

EXHIBIT 1B



Asad Gilani <asad.s.gilani@gmail.com>

EEOC Determination

Asad Gilani <asad.s.gilani@gmail.com>

Thu, Dec 5, 2019 at 8:45 PM

To: "Greene, Cara" <CEG@outtengolden.com>

Cc: "Shah, Shan" <SShah@outtengolden.com>

Hi Cara and Shan,

Please see attach Right to Sue from EEOC.. Let me know what are the next steps. I am going to obtain full File from the Investigator

Thank You

**Gilani vs Teneo EEOC Determination - Righ to Sue Letter - Dated.pdf**

1951K

EXHIBIT – 2

Asad Gilani

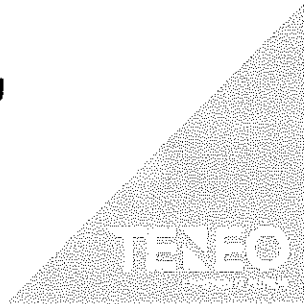
From: Steve Evans
Sent: Friday, February 1, 2019 4:44 PM
To: Asad Gilani; Brett Ayres; Piers Carey; Roy Wieland
Cc: Lauren Fortune; Marc Sollars
Subject: RE: Making it easier to do business in our home offices

Very nice work Asad! All those nights and weekends paid off! This is exactly the kind of result we're looking for. Thanks for your efforts!

Best Regards,
Steve

STEVE EVANS
VP of Solutions Engineering

direct: +1 804 514 9295
email: Steve.Evans@teneo.net
web: www.teneo.net



Teneo Inc, Registered Office: 44330 Mercure Circle, Suite 260, Dulles, VA 20166

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From: Asad Gilani
Sent: Friday, February 1, 2019 2:18 PM
To: Brett Ayres <BAyres@teneo.net>; Piers Carey <PCarey@teneo.net>; Roy Wieland <Roy.Wieland@teneo.net>; Steve Evans <Steve.Evans@teneo.net>
Cc: Lauren Fortune <lfortune@teneo.net>; Marc Sollars <msollars@teneo.net>
Subject: FW: Making it easier to do business in our home offices

This is LPL Internal Email send by Network Engineer. This email went from Jeff Peterson to all Technology Employees of LPL...

ASAD GILANI

Solutions Engineer

direct: +1 914 314 1799

email: Asad.Gilani@teneo.net

web: www.teneo.net

TENEO



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From: Jordyn Wisniewski <Jordyn.Wisniewski@lpl.com>

Sent: Friday, February 1, 2019 2:06 PM

To: # TECH - Employees <TECH-Employees@lpl.com>

Subject: Making it easier to do business in our home offices

The network engineering team spent much of last year working to improve the capabilities and resiliency of the network infrastructure our home office colleagues use every day to connect to each other, the internet and our data centers. What started as an effort to diversify our network traffic across two carriers expanded to include a complete modernization of our Wide Area Network (WAN) with software intelligence managing data quality, security, and resiliency. That effort is now complete and I want to congratulate the entire team for all they did to make it easier for all home office electronic communication!

The first phase of implementation was upgrading our Boston office and data centers in Q2, 2018. Following a successful test, the Cleveland office was updated in Q3 followed by San Diego in Q4. After a brief delay due to hardware issues, the Fort Mill upgrade was completed in January. Now, all of our home offices are benefitting from the improved speed and resiliency of the network. In fact, we have had several network outages since the completion of this project and they have been transparent to business operations!

In positioning LPL's network for the future, there are several benefits that were adopted and we can expect as we move forward:

- Flexibility to make it easier to onboard acquisitions, integrate cloud services, and expand/contract bandwidth
- Enabler to completing the rollout of our BYOD program
- Greatly simplifies business continuity in the event of an office closure

Please join me in thanking the team for making this happen!

Jeff Peterson
LPL Financial
Vice President | Technology
Direct: (980) 264-8150

EXHIBIT – 3

Asad Gilani

From: Chris Seguin <Chris.Seguin@riverbed.com>
Sent: Wednesday, May 15, 2019 9:30 AM
To: Steve Evans; Asad Gilani
Subject: 5/29 SDWAN Enablement

Guys,

We are in the process of identifying the correct resource for the session in NY slated for the 29th of this month.

Does Teneo have access to the 2.12 (new version of SCM) enhancements?

Also, would it make better sense to do a larger training session in Richmond and touch more of the team?

Sincerely,

Chris Seguin
Director, Partner Next Generation Networking
770-362-4493
RCPE Network & Infrastructure Associate

Asad Gilani

Subject: FW: Cloud Infrastructure CoE Office Hours / Design Review
Location: <https://riverbed.webex.com/meet/pflanagan>
Start: Fri 6/28/2019 11:00 AM
End: Fri 6/28/2019 1:00 PM
Show Time As: Tentative
Recurrence: (none)
Meeting Status: Not yet responded
Organizer: Patrick Flanagan
Importance: Low

Brett – I do not know if I forwarded it to you meeting with Riverbed Team. I had a conference call today which I forward you invite but I do not think you joined

-----Original Appointment-----

From: Patrick Flanagan [mailto:Patrick.Flanagan@riverbed.com]
Sent: Tuesday, June 25, 2019 11:27 AM
To: Patrick Flanagan; Asad Gilani
Subject: FW: Cloud Infrastructure CoE Office Hours / Design Review
When: Friday, June 28, 2019 11:00 AM-1:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: <https://riverbed.webex.com/meet/pflanagan>
Importance: Low

From: Patrick Flanagan

Sent: Tuesday, May 21, 2019 3:45:20 PM (UTC-05:00) Eastern Time (US & Canada)

To: se-americas; Ty Parker; Jesse Goodier; Scot Wilson; Amar Pallampati; Ken Kitsch; Sandeep Mehta; Kary Rogers; Brad Wood; Michael Kaehly; Joe Bombagi; Jon Milford; Christopher Conlon; Steven Rezsutek; Greg Mueller; Stephane Caunes
Cc: Jay Horne; Keith Cantrell; Matthew Easley; Eric Cox; Ian McNamara; Nick Clouse; Gary Marsh; Mark Schmidt; Brian Vickery; Drew Arnold; Joe Kane; Jamie Lozan; Karyn Goldstein; Nabeel Khashan; Nick Nichols; Paul R. Dietz; Majid Noori; Joe Czyz; Rich Schofield; Lorne Rodrigue; Jeronimo Asmar; Jeff Davidson; Jamie Harris; Greg Stracener; Sergey Chopchyts; Ujwal Yerramilli; Chandrashekar Thimmadasaiah; Robbie Thedford; Ethel Gondim; Nuno Diogo; Mike Falkenrath; Brent Smith; Tim Drinkard; Michael Fuller; Mark Trojanowski; Chuck Asbury; Sean Cartin; Tony Horne; Rick Apgar; Brian Treadwell; Peter Graupp; Samuel Fitzpatrick; Travis Brueggemann; Kenneth Vicchio; Carlos Rodriguez; John Kaminski; Eddie Mak; Jim Turiano; Glenn Boyle; Thad Bissell; Chris Brooks; Brent Sahl; Marco Speckert; Andrew Nicolson; Kanta Nakashima; Greg Hutton; Marcelo Rodriguez; Jason Smith; Joe Cabral; Darryl Gratz; Eduardo Costa Lopes; Thomas Schuchmann; Bob Polotaye; David Harrison; Davide Salvatore; John Parker; Darrin Cooke; Carl Hohenstein; Mark Leonard; Mick Collins; Michelle Jackman; Stephen Creel; Larry Wiltshire; Deon Rice; Joseph Kraenzle; Thomas Schaller; Graeme Thomson; Jeffrey Wickham; Matt Sherman; Andrei Uyehara; Paul Byers; Kevin DeRidder; Charles Kaplan; Christopher Darmofal; Ralph Waters; Krish Krishnan; Thomas Banks; Gary Pugh; Thomas Telligman; Rich Miller; Terrell Gross; Kara Meriweather; Arvind Murali; Abdelhak Hammouch; Trish Caldiero; Anupam Barde; James Williamson; J Camacho; Todd Keyser; Roger Cheeks

Subject: Cloud Infrastructure CoE Office Hours / Design Review

Audience: Tech Sales

Panelists: Americas Cloud Infrastructure CoE, representatives from PM, TAC, PS, SE community

Announcing: Cloud Infrastructure CoE Office Hours. These sessions are a spiritual successor to the previous CTO Office Hours and TRB. We will be including a broad panelist group from cross-functional areas of the business and we also encourage SEs with hands-on experience in specific design areas to add input.

We will record the call, as well as document questions/validated designs so they can be referenced in the future.

Agenda:

First 30 minutes: CI CoE "Show & Tell" - New release info, competitive updates, demos, FAQs

Rest of call: Design/architectural reviews and guidance, live Q&A (time permitting)

Please send questions/design documents ahead of time (to Patrick Flanagan) if you would like them prioritized on the call (especially if they involve corner cases or unsupported functionality, or are complex in nature).

<https://riverbed.webex.com/meet/pflanagan> | 745 214 574

Join by phone

+14044104502 US Toll

+18773107479 US & Canada Toll Free

Access code: 745 214 574

Asad Gilani

From: Brent Smith <Brent.Smith@riverbed.com>
Sent: Friday, June 21, 2019 11:09 AM
To: Patrick Flanagan; Gary Marsh; Gary Pugh; Torey Fox; Asad Gilani
Cc: Brett Ayres
Subject: Re: Intro / discuss Versa call

Oh, roger that. Ok with me then.

Brent

Brent Smith, CCIE-R/S #38255
Technical Solutions Architect
Cloud Infrastructure Center of Excellence
Riverbed Technology
Mobile: 832.270.8857
Email: brent.smith@riverbed.com



From: Patrick Flanagan <Patrick.Flanagan@riverbed.com>
Date: Friday, June 21, 2019 at 10:08 AM
To: Brent Smith <Brent.Smith@riverbed.com>, Gary Marsh <Gary.Marsh@riverbed.com>, Gary Pugh <Gary.Pugh@riverbed.com>, Torey Fox <Torey.Fox@riverbed.com>, Asad Gilani <Asad.Gilani@teneo.net>
Cc: Brett Ayres <BAyres@teneo.net>
Subject: Re: Intro / discuss Versa call

We'll be in SF so 8 AM should get us in prior to the training session beginning. The following week is our July 4 off week so wanted to squeeze this in if possible.

From: Brent Smith
Sent: Friday, June 21, 2019 11:06:52 AM
To: Patrick Flanagan; Gary Marsh; Gary Pugh; Torey Fox; Asad Gilani
Cc: Brett Ayres
Subject: Re: Intro / discuss Versa call

Won't we be deep into training at that time? If so, I'd prefer to do it the following week.

Brent

Brent Smith, CCIE-R/S #38255
Technical Solutions Architect
Cloud Infrastructure Center of Excellence
Riverbed Technology
Mobile: 832.270.8857
Email: brent.smith@riverbed.com

Asad Gilani

From: Peter Thornhill
Sent: Wednesday, July 18, 2018 4:30 PM
To: Steve Evans
Subject: CEO Club

Hi Steve,

I thought I'd drop you a quick note about Asad's recent contribution to my projects and to Teneo and to personally recommend Asad to be nominated for the CEO club this year. The recent projects Asad has managed include;

- BD – SD-WAN, Data Center migration, SteelCentral
- Bechtel – Viptela POC
- Hyster-Yale – VeloCloud/SilverPeak
- PPD – Dynatrace PC for CTMS

Asad has been deeply committed to provide my customers with support and consultative approach to their specific business needs. Despite the overwhelming amount of work that Asad has to do, he consistently finds ways to take the time to provide valuable updates on my projects.

Thanks,

VP - Enterprise Accounts

direct: +1 703.212.3221
mobile: +1 703.732.6121
email:
web:



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EXHIBIT – 4

Asad Gilani

From: Roy Wieland
Sent: Friday, June 29, 2018 3:09 PM
To: Steve Evans
Cc: Piers Carey; Scott Gibson; Asad Gilani
Subject: CEO CLUB Nomination - support

Steve,

I would like to express my full support and nomination for Asad Gilani to attend the CEO CLUB.

Asad helped me close and deliver our first THREE SD-WAN Deals at COX MEDIA GROUP, LPL Financial, and Home Shopping Networks.

These deals included heavy services at great margins.

All customers are happy and will be future references for Teneo.

Asad and I have identified another 15 SD-WAN opportunities for upcoming new fiscal year.

A fine job for which he should be appropriately recognized..

Thanks.

Senior Director - Enterprise Accounts

direct: +1 404 374 9261
email:
web:



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EXHIBIT 4-b

Asad Gilani

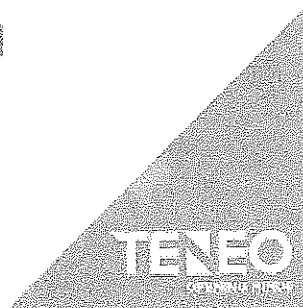
From: John Stanton
Sent: Friday, July 20, 2018 5:52 PM
To: Piers Carey
Subject: Recommendation for Iceland

Piers,
Asad Gilani has done a very fine job with especially the United Airlines SDWAN professional services project scope and among other projects. He is putting in great diligence and effort on this services project and spent numerous hours helping out with planning and has put forth great efforts. With this said, I want to nominate Asad as a candidate for the trip to Iceland since there may be potential spots available. Thanks to Asad for all of his efforts this past year. John Stanton.

JOHN STANTON

Account Executive

mobile: +1 (773) 519-4637
email: JStanton@teneo.net
web: www.teneo.net



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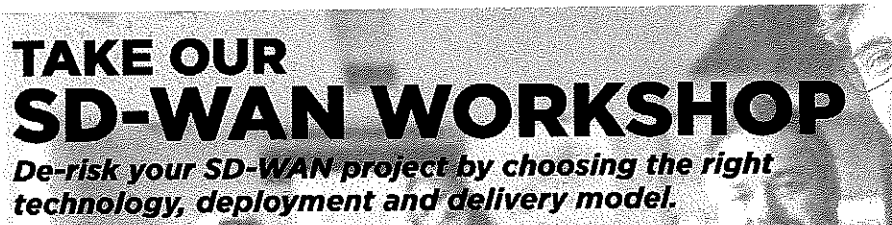


EXHIBIT – 5

Asad Gilani

From: Roy Wieland
Sent: Friday, September 14, 2018 3:06 PM
To: Steve Evans; Asad Gilani
Cc: Piers Carey; Scott Gibson
Subject: RE: Boston activation....

Great job Asad!

LPL Financial will be a great reference.

Also, they will have a three year software subscription renewal in March 2019.

In addition, I am sure they will need and request some addition PS for projects.

Nice.

Senior Director - Enterprise Accounts

direct: +1 404 374 9261
email:
web:



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technology, deployment and delivery model.*

From: Steve Evans
Sent: Friday, September 14, 2018 11:34 AM
To: Asad Gilani <Asad.Gilani@teneo.net>; Roy Wieland <Roy.Wieland@teneo.net>
Cc: Piers Carey <PCarey@teneo.net>; Scott Gibson <Scott.Gibson@teneo.net>
Subject: RE: Boston activation....

Asad,

Great customer feedback! Nice job! Good to hear that Viptela now has sub-second failover.

Best Regards,
Steve

VP of Solutions Engineering

direct: +1 804 514 9295
email:
web:



TAKE OUR SD-WAN WORKSHOP

De-risk your SD-WAN project by choosing the right technology, deployment and delivery model.

SD-WAN WORKSHOP

GET THE SAMPLE AGENDA >>

From: Asad Gilani
Sent: Friday, September 14, 2018 11:20 AM
To: Steve Evans <Steve.Evans@teneo.net>; Roy Wieland <Roy.Wieland@teneo.net>
Cc: Piers Carey <PCarey@teneo.net>; Scott Gibson <Scott.Gibson@teneo.net>
Subject: RE: Boston activation....

Steve and Roy,

This is the LPL internal email Nan forward me about LPL Boston Activation... It was a success...

Legacy Network fail over was 30-90 seconds. The New Viptela Network millisecond failover and no business Impact.

LPL Test/Validation was for 6 hours...

Solutions Engineer

direct: +1 914 314 1799

email:

web:



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De-risk your SD-WAN project by choosing the right technology, deployment and delivery model.

SD-WAN WORKSHOP

GET THE SAMPLE AGENDA >>

From: Nana-Yaw Anim [<mailto:Nana-Yaw.Anim@lpl.com>]

Sent: Wednesday, September 12, 2018 1:48 PM

To: Asad Gilani <Asad.Gilani@teneo.net>

Subject: Fwd: Boston activation....

Sent from my iPhone

Begin forwarded message:

From: Davy Bannister <Davy.Bannister@lpl.com>

Date: September 9, 2018 at 7:27:13 PM EDT

To: Jeff Peterson <Jeff.Peterson@lpl.com>, Nana-Yaw Anim <Nana-Yaw.Anim@lpl.com>, Heath Hayes <Heath.Hayes@lpl.com>, Ricardo Gutierrez Ochoa <Ricardo.GutierrezOchoa@lpl.com>, Cheryl Leoni <Cheryl.Leoni@lpl.com>, Thomas Ruddy <Thomas.Ruddy@lpl.com>, Allegra Morse Brannon <allegra.morsebrannon@lpl.com>

Cc: Rajesh Sharma <Rajesh.Sharma@lpl.com>, Scott Seese <Scott.Seese@lpl.com>

Subject: Re: Boston activation....

Thank you all for the dedication and teamwork to accomplish this important milestone in our network modernization.

Davy

On: 09 September 2018 17:34,
"Jeff Peterson" <Jeff.Peterson@lpl.com> wrote:

A big thanks the team and key stakeholders above for their dedication and long weekend investment to make our Boston network migration a success!

It was a long fought two days of implementation, testing, and validation that all came together to be a huge win. The effort, and success of, was pivotal to meet FIT deadlines and position LPL in a better place for reliability/resiliency. Mission accomplished!

Again, I want to thank each and every one of you for your patience and support to pull this one off! The old saying of "it takes a village" couldn't ring truer words in what I observed this weekend.

Jeff

FINRA SIPC

EXHIBIT – 6



Teneo Ltd, Units 20/21 Theale Lakes Business Park
Moulden Way, Sulhamstead, Berkshire RG7 4GB

T: +44 118 983 8600
F: +44 118 983 8633

info@teneo.net
www.teneo.net

12th October 2018

Asad Gilani
661 Bedford Rd
Armonk
NY
10504

Dear Asad,

At your recent, successful annual performance review you received a performance score of 3.7. Employees who received a score of between 3.7 and 3.89 will be awarded a 4% salary increase. I am therefore pleased to confirm that your salary will increase by 4% to \$182,104 with effect from 1st October 2018.

Your remaining terms and conditions are unchanged.

Thank you for all your hard work and the contribution you made to Teneo's performance in the financial year.

Yours sincerely,

Rachel Head
VP of Human Resources

EXHIBIT – 7

QUARTERLY EMPLOYEE REVIEW TEMPLATE

Performance Review Summary: Asad Gilani

Overview

STATUS Complete

REVIEW CYCLE **Q1 2018-2019 Performance Cycle**

COMPLETED Oct 19, 2018

Due Dates

OVERALL DUE Oct 15, 2018

Reviewee Answers

Review Writers

PERFORMANCE OBJECTIVES

Initiate at least 1 SD-WAN PoC

Hyster Yale - Velocloud and Silver Peak

Weight: 0.9%

Rate your performance against your objectives on the following scale:

Asad Gilani

5 - Far Exceeds Standards

Please provide examples of your work to support your rating.

Asad Gilani

No response from Asad Gilani

SD-WAN Ambassador Certification

Complete SD-WAN Ambassador Certification

Weight: 92.6%

Rate your performance against your objectives on the following scale:

Asad Gilani

5 - Far Exceeds Standards

Please provide examples of your work to support your rating.

Asad Gilani

No response from Asad Gilani

Cisco Certification

Weight: 0.9%

Rate your performance against your objectives on the following scale:

Asad Gilani

3 - Meets Standards

Please provide examples of your work to support your rating.

Asad Gilani

No response from Asad Gilani

SD-WA PoC - Canaccord Genuity - Viptela

The initial Design has been completed. The Equipment list is provided to the customer. Customer will initiate in October

Weight: 4.6%

Rate your performance against your objectives on the following scale:

Asad Gilani

5 - Far Exceeds Standards

Please provide examples of your work to support your rating.

Asad Gilani

Design and Implemented SD-WAN, and Visibility as a Service. Introduced Silver Peak to Teneo

Althene - SteelConnect and Viptela PoC

We had provided the initial information to the customer. We were about to start the PoC with both SteelConnect and Viptela. Customer decided to work with the manufacture on PoC. I feel and have hope it will come back to us

Weight: 0.9%

Rate your performance against your objectives on the following scale:

Asad Gilani

5 - Far Exceeds Standards

Please provide examples of your work to support your rating.

Asad Gilani

I am the only one in Teneo sold 4 Viptela SD-WAN and Implemented three SD-WAN . Develop SD-WAN Process.

8/8/2019

Performance Review for Asad Gilani : Teneo Group on Namely

SUMMARIZED RATING

Total 4.6

Asad Gilani: 4.6

Review Writers

PERFORMANCE OBJECTIVES

Initiate at least 1 SD-WAN PoC

Hyster Yale - Velocloud and Silver Peak

Weight: 0.9%

Rate your employee's performance against their objectives on the following scale:

Steve Evans

5 - Far Exceeds Standards

Please provide examples of your employee's work to support your rating.

Steve Evans

Asad started 3 POC's during the quarter which far exceeds the objective goal.

SD-WAN Ambassador Certification

Complete SD-WAN Ambassador Certification

Weight: 92.6%

Rate your employee's performance against their objectives on the following scale:

Steve Evans

3 - Meets Standards

Please provide examples of your employee's work to support your rating.

Steve Evans

Certification completed.

Cisco Certification

Weight: 0.9%

Rate your employee's performance against their objectives on the following scale:

Steve Evans

2 - Below Standards

Please provide examples of your employee's work to support your rating.

Steve Evans

When asked, Asad had said he would be able to get this done. In the last week of the quarter he said he studied for the wrong exam and could not get it completed.

SD-WA PoC - Canaccord Genuity - Viptela

The initial Design has been completed. The Equipment list is provided to the customer. Customer will initiate in October

Weight: 4.6%

Rate your employee's performance against their objectives on the following scale:

Steve Evans

3 - Meets Standards

Please provide examples of your employee's work to support your rating.

Steve Evans

Design has been done for the POC and is in a holding pattern but we hope they will come back to us to do it.

Althene - SteelConnect and Viptela PoC

We had provided the initial information to the customer. We were about to start the PoC with both SteelConnect and Viptela. Customer decided to work with the manufacture on PoC. I feel and have hope it will come back to us

Weight: 0.9%

Rate your employee's performance against their objectives on the following scale:

Steve Evans

3 - Meets Standards

Please provide examples of your employee's work to support your rating.

Steve Evans

Asad has provided the customer with what was needed to move to POC and we expect they will look to use for delivery and services.

8/8/2019

Performance Review for Asad Gilani : Teneo Group on Namely

SUMMARIZED RATING

Total 3.2

Steve Evans: 3.2

EXHIBIT – 8

8/8/2019

Performance Review for Asad Gilani : Teneo Group on Namely

QUARTERLY EMPLOYEE REVIEW TEMPLATE

Performance Review Summary: Asad Gilani

Overview

STATUS Complete

REVIEW CYCLE Q2 2018-2019 Performance Cycle

COMPLETED Jan 22, 2019

Due Dates

OVERALL DUE Jan 19, 2019

8/8/2019

Performance Review for Asad Gilani : Teneo Group on Namely

Reviewee Answers

Review Writers

PERFORMANCE OBJECTIVES

Althene - SteelConnect and Viptela PoC

Services

Weight: 25.0%

Rate your performance against your objectives on the following scale:

Asad Gilani

5 - Far Exceeds Standards

Please provide examples of your work to support your rating.

Asad Gilani

Provided the Technical information

Hyster Yale - SD-WAN Sale and Services

By December Hyster Yale will decide which solution they want to move forward
VeloCloud or Silver Peak

Weight: 25.0%

Rate your performance against your objectives on the following scale:

Asad Gilani

5 - Far Exceeds Standards

Please provide examples of your work to support your rating.

Asad Gilani

Completed VeloCloud Pilot

Renew RCSA-NPM Certification

Weight: 25.0%

8/8/2019

Performance Review for Asad Gilani : Teneo Group on Namely

Rate your performance against your objectives on the following scale:

Asad Gilani

3 - Meets Standards

Please provide examples of your work to support your rating.

Asad Gilani

Unable to handle multiple technologies...

Initiate at least 2 new SD-WAN PoC

Weight: 25.0%

Rate your performance against your objectives on the following scale:

Asad Gilani

5 - Far Exceeds Standards

Please provide examples of your work to support your rating.

Asad Gilani

POC and Deployments of LPL and HSN SD-WAN

SUMMARIZED RATING

Total 4.5

Asad Gilani: 4.5

Review Writers

PERFORMANCE OBJECTIVES

Althene - SteelConnect and Viptela PoC

Services

Weight: 25.0%

Rate your employee's performance against their objectives on the following scale:

Steve Evans

3 - Meets Standards

Please provide examples of your employee's work to support your rating.

Steve Evans

He provided the technical information but the POC's did not start during the quarter.

Hyster Yale - SD-WAN Sale and Services

By December Hyster Yale will decide which solution they want to move forward
VeloCloud or Silver Peak

Weight: 25.0%

Rate your employee's performance against their objectives on the following scale:

Steve Evans

5 - Far Exceeds Standards

Please provide examples of your employee's work to support your rating.

Steve Evans

Asad did a great job running 2 POC's at Hyster Yale, one for Velocloud and the other for Silver Peak. He spent many hours on weekends doing cut-overs during change windows and ensured they had everything they needed to be successful. They are expected to chose one of those solution based on this work.

Renew RCSA-NPM Certification

8/8/2019

Performance Review for Asad Gilani : Teneo Group on Namely

Weight: 25.0%

Rate your employee's performance against their objectives on the following scale:

Steve Evans

2 - Below Standards

Please provide examples of your employee's work to support your rating.

Steve Evans

Did not complete the certification agreed upon.

Asad's comment:

Unable to handle multiple technologies.

Initiate at least 2 new SD-WAN PoC**Weight: 25.0%**

Rate your employee's performance against their objectives on the following scale:

Steve Evans

5 - Far Exceeds Standards

Please provide examples of your employee's work to support your rating.

Steve Evans

Asad spent significant time on LPL Financial and HSN ensuring they successfully implemented Viptela and also driving 2 POC's at Hyster Yale, one for Velocloud and another for Silver Peak. This included in-depth design, migration planning, and much more.

SUMMARIZED RATING

Total 3.8**Steve Evans: 3.8**

EXHIBIT – 9

8/8/2019

Performance Review for Asad Gilani : Teneo Group on Namely

QUARTERLY EMPLOYEE REVIEW TEMPLATE

Performance Review Summary: Asad Gilani

Overview

STATUS Complete

REVIEW CYCLE **Q3 2018-2019 Performance Cycle**

COMPLETED Mar 27, 2019

Due Dates

OVERALL DUE Apr 02, 2019

8/8/2019

Performance Review for Asad Gilani : Teneo Group on Namely

Total 4.0
Brett Ayres: 4.0

8/8/2019

Performance Review for Asad Gilani : Teneo Group on Namely

Reviewee Answers

Review Writers

PERFORMANCE OBJECTIVES

- Train US SD-WAN Sales Overlay on our 3 focus SD-WAN technologies (Cisco SD-WAN, Unity EdgeConnect & SteelConnect)

Train US SD-WAN Sales Overlay on our 3 focus SD-WAN technologies (Cisco SD-WAN, Unity EdgeConnect & SteelConnect)

Weight: 25.0%

Complete required training

Rate your performance against your objectives on the following scale:

Asad Gilani

No response from Asad Gilani

Please provide examples of your work to support your rating.

Asad Gilani

No response from Asad Gilani

- Work with SD-WAN Practice Team to define approach for Workshops, Pilots, Migrations

Work with SD-WAN Practice Team to define approach for Workshops, Pilots, Migrations

Weight: 25.0%

Define TSIP overview process

Create guide and level 2 proocesses with SD-WAN team

Rate your performance against your objectives on the following scale:

8/8/2019

Performance Review for Asad Gilani : Teneo Group on Namely

Asad Gilani

No response from Asad Gilani

Please provide examples of your work to support your rating.

Asad Gilani

No response from Asad Gilani

Maintain SD-WAN certifications and stay up to date with developments with our 3 focus vendors (Cisco SD-WAN, Unity EdgeConnect & SteelConnect)

Weight: 25.0%

Rate your performance against your objectives on the following scale:

Asad Gilani

No response from Asad Gilani

Please provide examples of your work to support your rating.

Asad Gilani

No response from Asad Gilani

Initiate new SD-WAN PoC as required by Sales

NOTE: Link \$1000 bonus if completed

Weight: 25.0%

First Advantage PoC

Rate your performance against your objectives on the following scale:

Asad Gilani

No response from Asad Gilani

Please provide examples of your work to support your rating.

Asad Gilani

No response from Asad Gilani

8/8/2019

Performance Review for Asad Gilani : Teneo Group on Namely

Review Writers

PERFORMANCE OBJECTIVES

- Train US SD-WAN Sales Overlay on our 3 focus SD-WAN technologies (Cisco SD-WAN, Unity EdgeConnect & SteelConnect)

Train US SD-WAN Sales Overlay on our 3 focus SD-WAN technologies (Cisco SD-WAN, Unity EdgeConnect & SteelConnect)

Weight: 25.0%

Complete required training

Rate your employee's performance against their objectives on the following scale:

Brett Ayres

4 - Exceeds Standards

Please provide examples of your employee's work to support your rating.

Brett Ayres

We did not hire an SD-WAN overlay for the US. However, Asda has worked with Adam and US SE team on SD-WAN opps and also created some training material around Meraki.

- Work with SD-WAN Practice Team to define approach for Workshops, Pilots, Migrations

Work with SD-WAN Practice Team to define approach for Workshops, Pilots, Migrations

Weight: 25.0%

Define TSIP overview process

Create guide and level 2 proocesses with SD-WAN team

Rate your employee's performance against their objectives on the following scale:

Brett Ayres

4 - Exceeds Standards

8/8/2019

Performance Review for Asad Gilani : Teneo Group on Namely

Please provide examples of your employee's work to support your rating.

Brett Ayres

Excellent contribution to the process and some good work on the TSIP document. Level 2 will be worked on in Q4

Maintain SD-WAN certifications and stay up to date with developments with our 3 focus vendors (Cisco SD-WAN, Unity EdgeConnect & SteelConnect)

Weight: 25.0%

Rate your employee's performance against their objectives on the following scale:

Brett Ayres

4 - Exceeds Standards

Please provide examples of your employee's work to support your rating.

Brett Ayres

Up to date will all certs and haqs also started work on Meraki and already put a recommendation to a customer (118 118) for a solution with \$145k GP

Initiate new SD-WAN PoC as required by Sales

NOTE: Link \$1000 bonus if completed

Weight: 25.0%

First Advantage PoC

Rate your employee's performance against their objectives on the following scale:

Brett Ayres

4 - Exceeds Standards

Please provide examples of your employee's work to support your rating.

Brett Ayres

PoC for - First Advantage, Connect for Health. Also supporting Cook's Medical with deployment issues

SUMMARIZED RATING

8/8/2019

Performance Review for Asad Gilani : Teneo Group on Namely

8/8/2019

Performance Review for Asad Gilani : Teneo Group on Namely

Performance Summary

Performance Rating

4.0

Performance Note

Thank you for your contribution this quarter. Your help with the development of the TSIP has been key to moving the SD-WAN processes forward.

EXHIBIT – 10

1. MR. EVANS: Hello – Asad
 2. << MR. EVANS speaking very relax >>
 3. MR. GILANI: My computer is bad, the analog is bad
 4. MR. EVANS: What Analog
 5. MR. GILANI: My speaker is bad on the Computer
 6. MR. GILANI: I can hear you but you cannot not –
 7. You cannot hear me, What is up. Hi Rachel
 8. MR. EVANS: Is Rachel on
 9. MR. HEAD: I am on Steve, Hi Asad
 - 10.MR. GILANI: Hi How are you Rachel
 - 11.MR. HEAD: I am fine Thank You
 - 12.MR. GILANI: What is up?
 - 13.MR. EVANS: Yeah what I wanted to do Asad was get
 - 14.Rachel on the line to go over verbally her internal
 - 15.Investigation of your complaint before she gave it
 - 16.to you in writing. So I go over give it to Rachel
-

17.S. HEAD: After your email on the 18th of June and our call couples

18.of days later. I have taken your complaint very seriously and the

19. allegations like this something that Teneo is very concerned about. I want to give

20. you feedback what I found out after the call. So first I will give in the writing as

21. well but wanted I wanted to give verbally first.

22.MS. HEAD: The first feedback is that I spoke with DAN SOBEL

23.and he has admitted raising his voice during the argument and

24.appreciate this

25.is unacceptable. He also recalls describing as Redneck as couple of

26.months later

27.he told you that what he was in the context he had conversation he

28..... Outside work, he said he liked the out doors and he did not realize that this

29.label was associated with anything other original definition .

30.[See Exhibit AG-1 and

31.MS. HEAD: I do not see discriminatory however we are going to be

32.taking action that he raise his voice and use the term used the term (REDNECK).

33.MR. GILANI: He also called me Pakistani right, he also called

34. called me PAKI right, so I think the question is he also called me PAKI

35. MS. HEAD: Hey you did not tell me that

36.MR. GILANI: I worked with Steve and you can he is sitting

37. there he has never raised his voice, nobody has raised with each other

38. we have always communicated and this was a shock to me where I can tell

39. you it was very demining to me being Pakistani and telling me that he is a 3.

40. Redneck and he is yelling his voice and abusing on me. I take that very seriously

41. MS. Head:

42.MR. GILANI: I really do not to be honest with you Steve

43.and I had many different arguments we always talked about it. The question is
44.. that talk over ... This is nothing to do with this what started was Piers gave me
45.. some project at Cook's Medical and that was I was working on it and he got very
46..angry that I am taking over I actually asked Steve to give it to him
47.. in the return I was asking him I was furious I like , I am still do not, I still cannot
48. believe it. How he yelled at me and how he treated me and how he treated me
49.and he knew what is the Redneck in US means it is a very raciest term right
50.he is not a kid
51.MS. HEAD: Ok, just to confirm Asad I agree with you, that some one
52.to raise his voice and with a colleague and therefore we are going to take action
53.to relation to that. Calling himself a Redneck that something that again
54.that again make you feel un-comfortable we will be taking some action on
55.The only thing I would say couple months down the line [He said on April 3, 2019]
56. and when you said he called you another name I have not you have not tme

57.that at all.

58.MR. GILANI: It is a same time, yes, it is a same time

59.I agree your investigation, if he has not told you but I take it very seriously

60. because I for work, I am 62 years old, I am not a young man, I have worked

61. here 41 years. I have been here 41 years and I keep my eyes and ears open.

62.right so that is all.

63.MS. HEAD: We accept that this is not comfortable situation

64.for you. We will be taking some action that was the first point.

65.MS.HEAD: The second point you raised with me that

66.in relationship with Brett discrimination with you on two separate occasion

67.following request for Cisco Live and subsequently in relation to Silver Peak

68.road map day. I investigated that I know that but he declined your request because it was

69.too expensive. Adam Start and Roumen they went to

70. similar event but tickets were free so that was the reason why they were

71.able to go not you, therefore that is not discrimination.

72.MR. GILANI: No that is because I think what happen

73.we had the call with Steve with the Road Map the Customer a Vendor came back

74. and they said that he is registered with Dan Sabol. Where I had no clue about

75.that.

76.MS. HEAD: It is separate thing.

77.MR. GILANI: No no this is the part of training right

78.so hold down, so Rachel it is not two events it is one event. One event is ok

79.is training. **The discrimination is providing me the TRAINING.**

80.MS. HEAD Speaking over MR. Gilani

81.<< MS. HEAD Speaking over Mr. Gilani>>

82. MS. HEAD: It is about technical road map they are....

83.MR. GILANI: Interjected, no, no, no, you are not hearing me. What I am

84.saying that he was registered [Eluding to Mr. Ayers]. If we did not had money he

85.and Dan Sobel are registered [AG-Notes – Gavin] to go to Santa Clara is not that I

86.go to Silver Peak. The question is basically discrimination not providing me

87.opportunity to the training . Roumen went there, Dan Sobel is going there,

88. Brett

89.is going there that I feel I disagree with you guys that is the discrimination

90.against the training.

91. MS. HEADS: Ok fair enough. You disagree right by me.

92.because you did not go to Ciscolive because of the cost. The Silver Peak Technical

93.Technical Roadmap The opportunity for Dan and Brett it is come in the future

94.is not they get to go because they need the development and **you had years of**

95.**experience” and you know all.**

96.MR. GILANI: Rachel, Rachel lets not take to that way. I disagree

97.with your commentary. The question is you have to hear me out

98.It is discrimination as simple as that Teneo denied, Teneo denied opportunity to me to be

99.learned and they are doing it to the white people. That something is

100. a key and I am being very honest about it whether you agree or not agree

101. that is fine with me. Right.

102. <<< MS. HEAD'S SHOWS SOME TENTION IN HER VOICE>>>

103. MS. HEAD: So we have to agree to disagree Asad my

104. Findings are not discriminations

105. MR. GILANI: I know what I am saying it is your decision but the

106. key is going to I have put this forward to EEOC they will come back to you and

107. they will talk to you that is all.

108. MS. HEAD: I understand that and I wish you the best

109. today request we get from the EEOC and understand and we will corporate

110. it. I will certainly tell them my side of the findings and I appreciate it

111. but they will come to their own conclusion. I ... bit saying what my

112. conclusions are.

113. MR. GILANI: That is ok.

114. MS. HEAD: Yes Ok.

115. MS. HEAD: So moving to the Third point you made , actually

116. you made complaint after the call. You said that Steve Evans has discriminated

117. against you he is on the call I know, in relation to your disability.

118. so I understand he checking in with you weather you could

119. life, first of all when you spoke to me you said , he is asked you

120. to life the equipment. My understanding is he asked you status of

121. injury herniated disc to establish weather you were to life it

122. when you said you were not he made alternative arrangements. So I do believe

123. it represent disability discrimination.

124. MR. GILANI: That is your findings ... I think the question is

125. I would not agree with you the question I have reported that to what you

126. call to the EEOC

127. MS. HEAD: SO

128. MR. GILANI: Go ahead

129. MS. HEAD: I standard again... if they ask me about

130. I will tell them why I find as I did. If they decide it actually

131. MS. HEAD: The fourth point is that you made a complaint

132. of conduct of Steven Webreck and Nick Malone and they were not complaints

133. of discriminatory conduct and I still asked their manager to investigate and take

134. action Accordingly. You told me about this that Steven's language is the

135. behavior and relationship..... and he require the allegation about

136. Nick Malone we need to take action. But I do not believe that is discrimination

137. <<<< Nick Malone brought Garnet's contact info in Teneo>>

138. MR. GILANI: I am not talking about the discrimination

139. that was the point where Steve Webreck I was talking about is and I met him

140. there was a gentleman Mike Lefarmenta some body when I went from

141. there to Silver Peak to meet Scott and I talked to him how is your meeting

142. with Riverbed and he said as I told you that he said he was a "DICK HEAD" right

143. The question is that he has to develop a relationship not me.

144. MS RACHEL: Absolutely. You raised this on a conversation

145. we take this very seriously, we mean all of our employees behave in a

146. Professional fashion and uphold our reputation and not underline our

147. Values. Taking your point you raised about Steven and the point you raised

148. about Nick

149. MR. GILANI: Nick to be honest with you. I am exited

150. taking Nick everywhere and just he put me on the stab on the back

151. is called discrimination or not discrimination I have done with any

152. body I have to be honest with you with Teneo. I feel that

153. because he is from south, he reacted that way, he feels that way

154. Steve is from there you are from England, Roy is from there

155. never said anything like that. He has been here only two months

156. not even a month and I am giving him all the contacts

157. and walking him thru and he is putting my reputation. I personally

158. believe if that is the case and there was another one right. There was last one.

159. MS: RACHEL: And what was last one

160. MR. GILANI: The last one was that I asked Piers

161. If he gives me the SD-WAN Team Lead position and he said he will

162. get back to me and he never did and he gave it to what you call.

163. MS. RACHEL: OK

164. MR. GILANI: He have it to what you call Brett Ayers

165. Brett Ayers. Brett has no clue of has no experience on the SDWAN side

166. he comes from the different side so. I feel I have been discriminated on

167. that is all.

168. MR. RACHEL: You do not raised this point originally

169. with me Asad. If you feel uncomfortable I will look into that one as well.

170. when EEOC comes back to me about at that point I will give them my

171. point of view.

172. MR.GILANI: Exactly. I am not putting any other

173. point, the other thing happen. That last week all of a certain

174. all meetings start cancelling. You mean that I told you it should not

175. cancelled. This might metalized, this might not materialized that

176. this what every stuff but I do not think my work should be impacted

177. I am the question is that. I had problems for two years this admn

178. back

179. back and fourth right. You know that it is right. You are aware that

180. in two

181. years I have not taken a day off and these three days I told you

182. take , Rachel you can take my PTO.

183. MS. HEAD: Yes, yes absolutely. As far as we are

184. concern you are off sick, you are entitled, We recognize that

185. MR. GILANI: That something I have not absued

186. when every I have to go and do the work what ever the work is. I was little

187. bit shocked with this whole thing that is all.

188. MS. HEAD: I understand, I understand Asad

189. MR. GILANI: I hope we can work out that is all

190. MS. HEAD: FOUR points of discrimination

191. and one complaint of other ... of conduct... as I said I will gave you

192. the feedback and I appreciate you bring in... for your Charge of EEOC

193. and I will corporate with them any they might undertake that is

194. irrespective of my findings and I will look into that and will corporate

195. with them

196. that concludes my findings from the investigation and now

197. I want to handover to Steve. Separate form this he now

198. needs to talk to you about

199. complaint about relation to your own conduct.

200. MR. EVANS: Exactly

201. MR. EVANS: On our last call that you said to key partners

202. or damaging to our relationship

203. MR. GILANI: I have never said anything to key Partners

204. Steve, Steve, Steve, I have not said anything to key partners

205. MR. EVANS: Yes, so You justified what you said but , it

206. not acceptable...

207. MR. GILANI: I never said anything to the key partners

208. you, you are not listing my voice, Steve, Steve, You are not listing..

209. hold on, hold on, I am going to drop it off. You are just not listing

210. I have not said anything to any of your key partners OK.

211. MR. EVANS: I am going to turnover to Rachel to explain

212. details

213. MR. GILANI: You are not listing, you are not listing. That

214. that is ok. This one I will bring up to, add to the EEOC. That is the
retaliation

215. go ahead.

216. MS. HEAD: Ok, Asad as Steve said, we are terminating your

217. employment affect from today.

EXHIBIT – 11

Asad Gilani

From: Asad Gilani
Sent: Friday, November 2, 2018 10:20 AM
To: Stephanie Hickam
Cc: Steve Evans
Subject: FW: [Teneo] Update: Our SD-WAN is completely down

Stephanie,

I received the following email from Imprivata Director this morning .

Is this what Teneo call SD-WAN Managed Service?

From: Jesse Myers [mailto:jmyers@IMPRIVATA.com]
Sent: Friday, November 2, 2018 6:45 AM
To: PUBLIC - Support <support@teneo.net>
Cc: Asad Gilani <Asad.Gilani@teneo.net>; Sean Cartin <sean.cartin@riverbed.com>; IT Network and Security <ITNetworkandSecurity@IMPRIVATA.com>; Ted Lambert <Ted.Lambert@riverbed.com>
Subject: RE: [Teneo] Update: Our SD-WAN is completely down

Embarrassing. In over 30 years in IT I've never seen such complete incompetence or total disregard from a foundational system and service provider. Everyone at Teneo and Riverbed should be absolutely ashamed.

Jesse Myers

Director, World Wide IT Infrastructure and SaaS Operations

781-761-2690
+1 860-839-4956
www.imprivata.com



From: support@teneo.net <support@teneo.net>
Sent: Friday, November 02, 2018 6:13 AM
Cc: Asad Gilani <asad.gilani@teneo.net>; Sean Cartin <sean.cartin@riverbed.com>; IT Network and Security <ITNetworkandSecurity@IMPRIVATA.com>
Subject: [Teneo] Update: Our SD-WAN is completely down

##- Please type your reply above this line -##

You are registered as a CC on this support request (<https://support.teneo.net/hc/requests/83116>).
Reply to this email to add a comment to the request.



Will Riccalton (Teneo)

2 Nov, 10:13 GMT

EXHIBIT – 12

Asad Gilani

From: Steve Evans
Sent: Thursday, April 18, 2019 3:23 PM
To: Asad Gilani
Cc: Brett Ayres; Paul Downing
Subject: Sedgewick

Hi Asad,

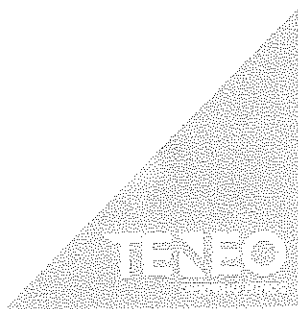
We are in need of your help with the Sedgewick account. The account is at risk because we have not provided a replacement for Justin to help them and Brett says you are the best man for the job. Can you, Paul and I have a call today to bring you up to speed on what is needed? Basically, they have two 1-hour calls each week to update on what they are doing with regards to getting their SD-WAN working. Gary Marsh is supporting them from Riverbed but we need a Teneo presence as well and we would probably want a call with him as soon as possible to get the latest from him. Damon and Mike have been on the calls, but are only really able to support them on their visibility questions. They need someone who understands routing etc.

I'm not sure yet exactly what they want us to help with so we'll need to be flexible. I will also join the calls to help out in case there are SteelHead questions you do not know. I don't know if SteelConnect will do the job for them, we will see I guess. But one important note is that we want to be very careful not to imply that SteelConnect should not have been chosen for their SD-WAN since we did recommend and sell it based on information provided at the time. However, if they come to the decision on their own that they are moving to something else, since we'll be showing a lot of value on the calls, we would surely be involved.

Thanks,
Steve

STEVE EVANS
SVP Solutions Engineering

direct: +1 804 514 9295
email: Steve.Evans@teneo.net
web: www.teneo.net



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EXHIBIT – 13

Asad Gilani

From: Asad Gilani
Sent: Wednesday, April 24, 2019 3:04 PM
To: Steve Evans; Asad Gilani
Subject: Conversation with Steve Evans

Asad Gilani 1:41 PM:

are you on the Sedgwick call
or it is at 2:30

Steve Evans 1:42 PM:

I think it is at 2:30 our time

Asad Gilani 1:42 PM:

got it
Thanks

Asad Gilani 2:08 PM:

i have another meeting at 3:00 - I will be on from 2:30 - 3:00 only

Steve Evans 2:24 PM:

ok. I would just let them know that due to the time change, you had another call scheduled...

2:24 PM Connected to Steve Evans (sevens@teneo.net).

2:30 PM Call with Steve Evans (sevens@teneo.net) has ended. Duration: 0:05:21

Asad Gilani 2:33 PM:

no one on the call yet

Asad Gilani 2:36 PM:

no one talking

Steve Evans 2:59 PM:

I would just drop off...I'll explain you had a call if needed

Asad Gilani 2:59 PM:

no it is tommrrow . i can stay until 3:30

Steve Evans 2:59 PM:

oh, ok

This sounds ugly

Asad Gilani 3:00 PM:

yep

Steve Evans 3:00 PM:

L)

:)

Asad Gilani 3:00 PM:

I need to have a call with FIS Team to really understand

EXHIBIT – 14

Asad Gilani

From: Asad Gilani
Sent: Friday, May 31, 2019 2:28 PM
To: Jeff McCance; Paul Downing
Subject: FW: Sedgwick Status Update
Attachments: RE: FISGlobal Report ; Sedgwick SD-WAN Pilot Presentation ; Sedgwick SteelConnect Pilot Review

I did not copy you guys... But here it is

From: Asad Gilani
Sent: Friday, May 31, 2019 1:53 PM
To: Piers Carey <PCarey@teneo.net>
Cc: Brett Ayres <BAyres@teneo.net>; Matt Lukash <MLukash@teneo.net>; Steve Evans <Steve.Evans@teneo.net>
Subject: Sedgwick Status Update

Piers,

As per our discussion following is the status update on Sedgwick.

Face to Face meeting with Sedgwick:

1. At our meeting David Huber asked what is our thoughts I told him that I understand the painful Pilot for Over two Years.
2. David Huber agreed and said that he has asked FID Global to provide the findings and he will share with us as Confidential (Report attached)
3. David Huber mentioned Riverbed SteelConnect is impacting their business in rolling out SD-WAN asked our suggestion. In addition he mentioned that they have already done Meraki Teleworker Pilot and it was successful.
4. They were unhappy that Once Justin left there was no other resource was assigned!.
5. He asked us to look into alternatives... May be Viptela might be the right choice or VeloCloud – David mentioned that he wants to move towards Cisco...

Projects on-hand:

6. Sedgwick Riverbed SteelConnect (SD-Ready and SDI-5030 Cluster) Project for 136 Branches and 3 Data Center
 - a. Only One DC and three to Four Branches are implemented. (Only two Site Types)
 - b. 12 to 13 more Site I identified needs to be implemented to call this Pilot a Successful.
 - c. Issues: SDI-5030 Cluster Issue. Now it is resolved.
7. Teleworker Steel Connect Project
 - a. Currently 16 Users connecting using SDI1-130 connecting to Data Center.
 - b. Issues: Took 3 to 4 Months of time to resolve the issue. Mix of Sedgwick Firewall and SDI-5030. Waiting for RCA from Riverbed.
 - c. Sedgwick did the Pilot using Meraki and it was successful. On the Call David Huber mentioned that they have to make a decision before June to Go with Meraki or SteelConnect. If successful they might Rollout to Call Center Agents (3000)
8. VeriClaim 62 Sites will follow Sedgwick Site Types
 - a. On-hold until Pilot is successful.
9. Lindsey and Cunningham
 - a. On-hold until Pilot is successful

Assessment :

- The Sedgwick Pilot (procured in 2016) is in early stages... I can think like 15% - (Sedgwick SD-WAN Pilot Presentation)
- We reviewed the Gap with Riverbed a week before and they agreed, but no one documented.
- As they require FULL MESH Between all sites (265) sites. Each device will require to handle 530 Tunnels
 - Current Release of 2.11 – Tunnel Capacity is 250, 2.12 Release is 450. Plus it also depends on the Traffic Policies....
- David Hubert mentioned on the call with Riverbed that They have to make a decision before June to move with Meraki or SteelConnect.

If we do go and complete the Pilot/Test/Validate it will take us at 2 to three months.

Asad Gilani

To: Steve Evans; Piers Carey
Cc: Brett Ayres; Matt Lukash
Subject: RE: Sedgwick Status Update

Steve,

I am in agreement. The good thing

From: Steve Evans **Sent:** Friday, May 31, 2019 10:23 PM

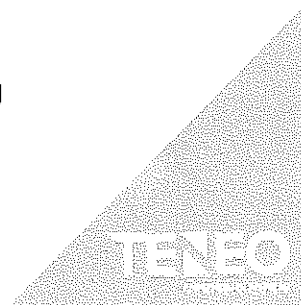
Hi Asad,

Thanks for that update. Very encouraging! Hopefully SteelConnect will work for them. Please keep us updated. I read through the FIS presentation and they are definitely trying to cover themselves but it sounds like it won't matter for them. They are on the outs. But this is our time to shine!

Steve

STEVE EVANS
SVP Solutions Engineering

direct: +1 804 514 9295
email: Steve.Evans@teneo.net
web: www.teneo.net



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A horizontal banner with a dark background and white text. On the right side, there is a circular graphic with a globe-like pattern. The text on the left reads: "WE SPECIALIZE IN SD-WAN." in large, bold letters, followed by "Experience across 6 SD-WAN technologies." and "Global services that remove risk from decision-making & deployment." in smaller text. At the bottom, it says "FIND OUT MORE >>" in bold. The Teneo logo is visible on the right side of the banner.

WE SPECIALIZE IN SD-WAN.

Experience across 6 SD-WAN technologies.

Global services that remove risk from decision-making & deployment.

FIND OUT MORE >>

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From: Asad Gilani
Sent: Friday, May 31, 2019 6:12 PM
To: Piers Carey <PCarey@teneo.net>
Cc: Brett Ayres <BAyres@teneo.net>; Matt Lukash <MLukash@teneo.net>; Steve Evans <Steve.Evans@teneo.net>
Subject: RE: Sedgwick Status Update

Piers,

Another Update... Just received a call from Sedgwick on the following items:

1. Sedgwick wants to make Riverbed Solution Work.
2. Riverbed has RCA (Root Cause Analysis) by next Wednesday and will have a patch to fix this issue.
3. Meraki Pilot was done by FIS Global as they are Cisco Partner and they buy all the equipment from Cisco. FIS Global is all certified by Meraki. Sedgwick IT was not involved. In addition, in December 2020, FIS Global Contract is finished and they will be releasing FIS Global or bringing in-house or looking for another partner.
4. Meraki Remote SD-WAN devices and Riverbed devices are same price except 50K more for Meraki Headend. Solution was 50K more expensive
5. May be they will request FIS Global to do the Meraki Pilot again with Sedgwick IT to ensure the recommendation of Riverbed or Meraki by Sedgwick IT.

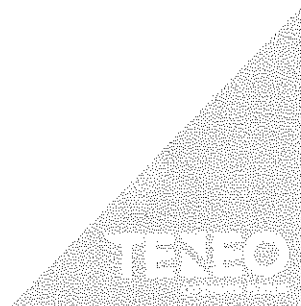
ASAD GILANI

Solutions Architect

direct: +1 914 314 1799

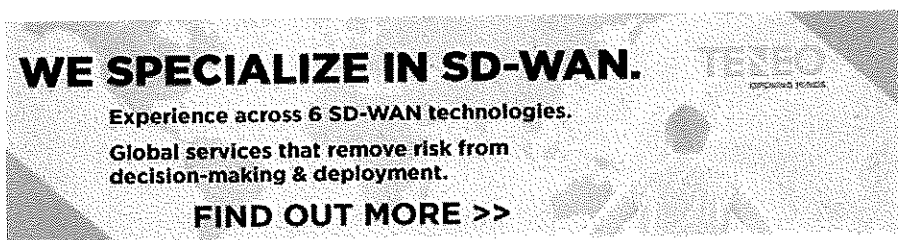
email: Asad.Gilani@teneo.net

web: www.teneo.net



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From: Asad Gilani

Sent: Friday, May 31, 2019 1:53 PM

To: Piers Carey <PCarey@teneo.net>

Cc: Brett Ayres <BAyres@teneo.net>; Matt Lukash <MLukash@teneo.net>; Steve Evans <Steve.Evans@teneo.net>

Subject: Sedgwick Status Update

Piers,

As per our discussion following is the status update on Sedgwick.

Face to Face meeting with Sedgwick:

1. At our meeting David Huber asked what is our thoughts I told him that I understand the painful Pilot for Over two Years.

2. David Huber agreed and said that he has asked FID Global to provide the findings and he will share with us as Confidential (Report attached)
3. David Huber mentioned Riverbed SteelConnect is impacting their business in rolling out SD-WAN asked our suggestion. In addition he mentioned that they have already done Meraki Teleworker Pilot and it was successful.
4. They were unhappy that Once Justin left there was no other resource was assigned!.
5. He asked us to look into alternatives... May be Viptela might be the right choice or VeloCloud – David mentioned that he wants to move towards Cisco...

Projects on-hand:

6. Sedgwick Riverbed SteelConnect (SD-Ready and SDI-5030 Cluster) Project for 136 Branches and 3 Data Center
 - a. Only One DC and three to Four Branches are implemented. (Only two Site Types)
 - b. 12 to 13 more Site I identified needs to be implemented to call this Pilot a Successful.
 - c. Issues: SDI-5030 Cluster Issue. Now it is resolved.
7. Teleworker Steel Connect Project
 - a. Currently 16 Users connecting using SDI1-130 connecting to Data Center.
 - b. *Issues: Took 3 to 4 Months of time to resolve the issue. Mix of Sedgwick Firewall and SDI-5030. Waiting for RCA from Riverbed.*
 - c. Sedgwick did the Pilot using Meraki and it was successful. On the Call David Huber mentioned that they have to make a decision before June to Go with Meraki or SteelConnect. If successful they might Rollout to Call Center Agents (3000)
8. VeriClaim 62 Sites will follow Sedgwick Site Types
 - a. On-hold until Pilot is successful.
9. Lindsey and Cunningham
 - a. On-hold until Pilot is successful

Assessment :

- The Sedgwick Pilot (procured in 2016) is in early stages... I can think like 15% - (Sedgwick SD-WAN Pilot Presentation)
- We reviewed the Gap with Riverbed a week before and they agreed, but no one documented.
- As they require FULL MESH Between all sites (265) sites. Each device will require to handle 530 Tunnels – Current Release of 2.11 – Tunnel Capacity is 250, 2.12 Release is 450. Plus it also depends on the Traffic Policies....
- David Hubert mentioned on the call with Riverbed that They have to make a decision before June to move with Meraki or SteelConnect.

If we do go and complete the Pilot/Test/Validate it will take us at 2 to three months.

EXHIBIT – 15

Asad Gilani

From: Asad Gilani
Sent: Tuesday, June 18, 2019 12:47 PM
To: Steve Evans
Cc: Piers Carey; Brett Ayres
Subject: Touch Base /
Attachments: RE: Sedgwick Status Update ; [Teneo] Update: Our SD-WAN is completely down; RE: CDG SteelHead/SDWAN Opp ; Teneo SD-WAN PreSales Process.pptx; Whirlpool Selection Process ; RE: Silver Peak roadmap session?

Steve,

We talked about the following items:

1. Silver Peak and Cisco (Viptela & Meraki)
 - a. I understand the direction that we have three products of choice. We have a challenge on the Cisco Product as we lost the deal with LPL.
 - b. When I spoke with Piers last week he mentioned that we have to do a deal registration first if it is a viable for us to have a commercial value.
 - c. So the SD-WAN Engagement Process calls for Teneo has not disseminated the SD-WAN Engagement Process which you promised, then Brett said Piers do not want to disseminate the process. I asked Piers and he said he has not seen the process or he might have seen the process. The process says if the opportunity is brought by Vendor we need to follow up with the Vendor. And you agreed. We all agreed that if it is a Vendor Product then we proceed with. I emailed the Whirlpool why Silver Peak was not selected. Greg Spraggins was very much confused about the process I emailed him the process and you and Brett agreed to this process.
 - d. When I received a notification on Riverbed and Versa Partnership. I was excited. You saw the email from Roumen that they both are looser. Brett called me up and asked me what is my thoughts. I told him it should be business as usual Silver Peak and Cisco but now Riverbed and Versa partnership is a big and we already have 52%. I also told Brett that Teneo is very Technical not Strategic on selecting the SD-WAN. You told me that you brought up Versa but it was shot down from Teneo Management Team
 - e. But I received Bonusly points from Danny. A Bit different. He is another account executive.

13-Jun-2019

Bonus

Danny Crockett -20 @asad.gilani
 information about the Riverbed
 agreement, and helping to lead
 online discussion of what this is
 Very engaging! #commitmentto
 #carpediem

- f. Developing Cisco part of developing relations is a challenge for Teneo and I help a lot

- g. I also discussed with Piers that I have asked Silver Peak to give us Road map but today we did not received any info.
- h. To get a meeting with Silver Peak it was me as well.
- i. I told Piers in front of Nick that Canaccord Genuity Team meets with New York City CIO and once we have a good service I will ask Canaccord Genuity. How long I know Canaccord Genuity seven years. I brought them in.
- j. Piers asked Nick to do Sales in NY for 4 Million, Nick told me that he is only to do 700K....
- k. Yes, I do get engaged form lot of people every week about SD-WAN job. If I have to leave I would have left long time ago
- l. On Nick saying that I want to start my business with Canaccord Genuity. This is incorrect information form Nick.

2. SteelConnect Product.

- a. Sedgwick: What I told them that Steel Connect does not work. When you were on the call with Sedgwick you said yourself that this was ugly. I email the status to all and tell them what it is. The customer is in pain. Teneo and Riverbed sold them first and now issues have surfaced. See Status update email. This is a new bug last week. I was told by Gary Marh today that Sedgwick Tea m – Mitch's Team had a call with Sedgwick yesterday and they are still very unhappy as another **bug surfaced last week SD-Ready lost the tunnel and SD-Ready 570 rebooted** . Should have not sold the product without understanding if the product works. Justin was on the project until last November. That was Teneo's decision not mine
- b. Imprivata: : See the status I provided to you and imprivata email. If the product does not work and Justin was on this project and he did not made it work. How can I if there is a problem with the Code. Sedgwick is doing this implementation since December 2016. See Teneo Update email
- c. Med James: Teneo sold SteelConnect to Med James and I am trying to implement Med James. Again Teneo sold the product and now I am making it work. I do not know how will this go.
- d. . We will do a discovery call. Steve should not be concern about it

3. Whirlpool Feedback attached .

- a. Why Whirlpool was not selected because of the gaps by Silver Peak –Email attached.
- b. I was the one who schedule a call with Kevin who is a Strategic Account told Nick that Silver Peak is invited in all the customers and then they are told at the end of the day they are not selected the other team.

They both had the concerns on how you told them Palo Alto is the only Firewall and told them that Silver Peak is the product.

I have done quite a lot of Teneo in last three years, including selling 4 Viptela SD-WAN and Implanted 2. We are getting mixed signals on either to support only Silver peak or Viptela or do very objectives.

Piers is the one who walked him thru to the Netsuite to add the Aternity Opportunity and Nick was supposed to send out the confirmation to Canaccord Genuity about both Meraki and Aternity. As of now the confirmation email did not go to Canaccord Genuity.

EXHIBIT – 16

RE: Whirlpool SDWAN Decision Criteria and Insights as it pertains to Silver Peak - Message (HTML)

File Message Insert Options Format Text Review Help Tell me what you want to do

Calibri 12 A⁺ A⁻ B I U Follow Up - High Importance Low Importance Tags

Attach Attach Signature File - Item - Include

Address Check Book Names Names

Basic Text

Send To... Cc... Subject

RE: Whirlpool SDWAN Decision Criteria and Insights as it pertains to Silver Peak

From: Dan Sabol Sent: Friday, May 17, 2019 1:05 PM

Hello Team,

As most of you know, Teneo and Silver Peak were in the running at Whirlpool for their SDWAN solution. Eric Schlutt, the Whirlpool Network Architect and one of the key decision makers, was gracious enough to have a conference call today to discuss their organizations SDWAN selection criteria and the vendor chosen. He was not at liberty to flat-out disclose the winning OEM/vendor, but based on information gleaned from the call, Velocloud was selected.

The Silver Peak areas of weakness from Eric's perspective were:

- The Orchestrator UI was cumbersome i.e. policy construction. Not as intuitive as other solutions and needs simplification making various settings easier to locate
- Tunnel creation between sites and to the cloud locations (AWS and GCP) not as elegant or streamlined as other solutions
- The HA design was not as developed as other solutions and the turnup was more difficult than it should have been. It took too long to get the HA site into a running state
- Not as scalable as other solutions i.e. inter-region constructs were lacking. The term "Road Map" was unacceptable
- The cost structure and bundling was different compared to other solutions, not a key differentiator but somewhat relevant

The Silver Peak areas of strength from Eric's perspective were:

- Application classification ease
- Sizing of HW platforms
- Monitoring and Visibility via GMS
- Appliance SW upgrade process via GMS

EXHIBIT – 17



Teneo Inc., 44330 Mercure Circle,
Suite 260, Dulles, VA 20166

T: 703.212.3220
F: 703.996.1118

info@teneo.net
www.teneo.net

6st September 2016

Asad Giliani
661 Bedford Road
Armonk, New York 10504

Dear Asad:

I am delighted to confirm the verbal offer of employment extended to you. Welcome to the team. As a member of a dynamic and fast growing small company, you should expect a very fluid environment, where your positive input and involvement into a number of different areas of the business, both inside and outside of your primary responsibilities will be required. Our culture is extremely team oriented. It demands a positive attitude and complete commitment by all Teneo, Inc. people to the constant belief that our success is solely driven by being our Partners' favorite partner and our Customers' favorite vendor.

Your position will be Solutions Engineer reporting to Steve Evans in the US Technical Team. Your scheduled start date is **23rd September 2016.**

Your compensation includes salary and benefits. Salary in the amount of \$170,000.00 per annum is paid monthly on the 25th provided you have rendered services during the pay period, subject to any deductions permitted under law. You will also be entitled to participate in a commission scheme with on target earnings of \$17,000 per annum. Details of this scheme will be provided to you separately by your manager.

As a full-time employee, you are eligible for the benefits listed below however, any benefits currently provided may be changed or removed at any time.

Sick Days: You will accrue 5 sick days each year that carry over to a maximum of 20.
Vacation: You will receive 15 vacation days per year and can carry over 3 in any year.
Holidays: You are eligible for paid holidays in accordance with our company policy, currently 8.
Health: You will be eligible to participate in the Company health insurance plan on the 1st day of the month following your date of employment. The company will provide the basic level of insurance for you and your family at no charge. You may buy up to other plans.
Dental: Provided on the same basis as Health Insurance.
LTD/STD: The Company provides long term and short term disability insurance at no cost.
401k: You will be eligible to join the company 401k scheme after 90 days. There is a match program detailed in the Employee Handbook.

On your first day of work, please be prepared to provide employment eligibility verification. Attached you will find a form outlining suitable forms of identification for submission.

The Company reserves the right to conduct background investigations and/or reference checks on all of its potential employees. Your job offer, therefore, is contingent upon a clearance of such a background investigation and/or reference check, if any.



Teneo Inc., 44330 Merentre Circle,
Suite 260, Dulles, VA 20166

T: 703.212.3220
F: 703.996.1118

info@teneo.net
www.teneo.net

As a Company employee, you will be expected to abide by the Company's rules and standards. Specifically, you will be required to sign an acknowledgment that you have read and that you understand the Company's rules of conduct which are included in the Employee Handbook.

As a condition of your employment, you are also required to sign and comply with a Non-Compete Agreement which is attached to this letter.

Teneo Inc is an at-will employer. This means that both you and Teneo Inc reserve the right to terminate the employment relationship at any time for any reason. This letter serves only to confirm our verbal discussion of your employment and does not constitute a contract of employment.

If you accept this offer of employment, please sign this letter and return it to me no later than **9th September 2016**.

Sincerely,

Rachel Head
Chief Operating Officer

Employee Acceptance of Job Offer

Employee signature

Date

Printed Name

EXHIBIT – 18

Asad Gilani

From: Asad Gilani
Sent: Friday, March 8, 2019 7:35 AM
To: Brett Ayres; Rachel Head
Cc: Steve Evans
Subject: RE: The Signature has not been changed as of this Morning

Thanks Brett!.

But this looks like a Pre-Sales Job Description. We can talk later

From: Brett Ayres
Sent: Friday, March 8, 2019 2:05 AM
To: Asad Gilani <Asad.Gilani@teneo.net>; Rachel Head <rhead@teneo.net>
Cc: Steve Evans <Steve.Evans@teneo.net>
Subject: RE: The Signature has not been changed as of this Morning

Asad

- The job description has been uploaded in to Namely already – but I have also attached a copy. Please call me if you have any questions or concerns.
- I will call you this morning (EST) as I want to know who is asking you to work on non US projects?
- The process follows up meeting was moved to accommodate the time difference over a week ago, which we have already discussed.

Speak soon.
Brett.

BRETT AYRES

Global SD WAN Practice Director
RCSP-NPM, RCSA-HCB, RCSA-APM

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mobile: +44 7824 140 760
email: BAyres@teneo.net
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Rachel,

It took some time to change it in Namely. I would like to see Job Description/Roles and Responsibilities with Compensation for New Role.

At this time Job Description and Roles and Responsible is very important. I am only supposed to support US based projects only. In addition, the first Process follow-up meeting was scheduled at 6:00 a.m. EST. I am sorry I do not work at GMT time. I work at EST time.

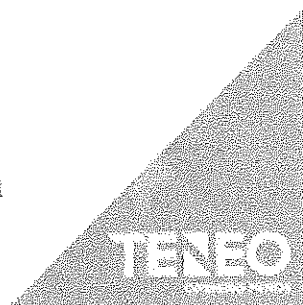
I just want to ensure that we all have the same and clear expectations. In addition, this Roles has to be Communicated to the US Team as well. Now, SD-WAN Architect Job Description and Roles and Responsible is very important.

Let me know the Job Description when ready

Thanks

ASAD GILANI
Solutions Engineer

direct: +1 914 314 1799
email: Asad.Gilani@teneo.net
web: www.teneo.net



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From: Rachel Head **Sent:** Thursday, March 7, 2019 10:34 AM

Mat

I changed these on Namely this morning.

Rachel

EXHIBIT 18-a



TENEJO JOB PROFILE

JOB NUMBER AND TITLE:	Solution Architect
JOB FUNCTION:	Technology
JOB GRADE:	1
REPORTS TO (JOB TITLE):	SD-WAN Practice Director
PURPOSE OF JOB:	Provide Technical Sales Advice and Service to Internal and External Customers from Specification through to Delivery

KEY RESPONSIBILITIES

- Assist the Sales Team to sell solutions to customers by working within a Teneo framework and using a common language
- Participate as a member of Customer Teams made up of representatives from various functions who collaborate to understand and enable the achievement of customer goals, contributing technical knowledge
- Meet with influencers and decision makers alongside Account and New Business Managers and Directors and proactively develop technical relationships
- Participate in presentations to groups of influencers and decision makers
- Provide demonstrations and set up, monitor and review the success of pilots
- Work within Customer Teams to formulate impactful and convincing recommendations and RFI and RFP responses
- Engage and work with vendors and other customer suppliers to integrate technologies
- Serve as the focal point for all non-support technical issues and questions on assigned Customers
- Provide training and consultancy services where appropriate
- Be a subject matter expert in SD-WAN
- Translate customer SD-WAN requirements into detailed "requirements documents" and work with the customer to identify the best SD-WAN and associated technology from Teneo SD-WAN portfolio
- Create SD-WAN designs and supporting documentation for SD-WAN transformation projects (including HLD, LLD, M-HLD, M-LLD & MOP)
- Work with Technical Sales Team and SD-WAN ecosystem partners to develop SD-WAN solutions which include security, visibility, connectivity and other complementary technologies as required.
- Assist in SD-WAN transformation projects as required.
- Support other pre-sales activities on other products if needed.

EDUCATION AND WORK EXPERIENCE

- Educated to degree level standard
- Excellent track record in technical sales
- Experience of designing and installing multiple network products in medium and large enterprises
- Experience of networking protocols (OSPF/BGP etc) and technologies (routing, switching, SD-WAN)
- Technical sales skills gained from a reseller or vendor background
- WAN Optimization (Riverbed, Silver Peak), NPM/APM (SteelCentral), and Security (Palo Alto Networks) a plus

**KNOWLEDGE SKILLS AND QUALITIES****KNOWLEDGE**

- Knowledge of major SD-WAN vendors such as Cisco, Riverbed, Viptela, Talari, Silver Peak.
- Good understanding of networking and network management
- Networking qualifications, such as Cisco CCNP or equivalent

SKILLS

Must have:

- Relationship management
- Problem solving
- Communication – questioning, listening, presenting, writing and verbal reasoning

Ideally:

- Time Management
- Organised and structured
- Consultative, business to business sales approach

QUALITIES

- Enthusiastic
- Helpful
- Curious
- Open Minded
- Driven

EXHIBIT – 19

Asad Gilani

From: Brett Ayres
Sent: Friday, February 1, 2019 7:56 AM
To: Roumen Doukov; Asad Gilani
Cc: Tom Weston
Subject: Re: JLI / Teneo troubleshooting SD WAN
Attachments: C3730065.PNG

Hi Roumen

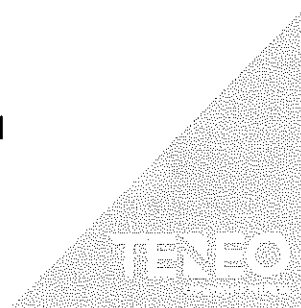
Have you spoken to Asad about this?

Thanks
Brett

BRETT AYRES

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> On 1 Feb 2019, at 09:16, Field, Andrew (EMEA) <Andrew.Field@eu.jll.com> wrote:

>

> Hi Tom, Brett,

> After I enabled the Test LAN in Glasgow for JLL to use the VC SDWAN, all works well, apart from F/W issue bellow.

> Basically all traffic go on the SDWAN and come to LDN and then hit the JLL Internal F/W and they getting the error bellow.

> I spoke with Andrew S. and he will join the call today to help.

>

> Anything or anybody else from Teneo that can have a look this and maybe have some idea?

>
> Other interesting thing is that the test PC can do ping and trace route successfully, but any other traffic get blocked by the F/W. JLL already spent 2x days try fixing it.
>
> Thanks
> Roumen
>
>
> -----Original Appointment-----
> From: Field, Andrew (EMEA) <Andrew.Field@eu.jll.com<mailto:Andrew.Field@eu.jll.com>>
> Sent: 31 January 2019 17:15
> To: Field, Andrew (EMEA); Andrew Schild; Ali, Asab; Roumen Doukov
> Subject: JLL / Teneo troubleshooting SD WAN
> When: 01 February 2019 13:30-14:30 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.
> Where: Teleconf / Webex
>
> Agenda:
> 1. Run through error
>
> [cid:CE44F0BD1696A0419940D65938979B27@namprd08.prod.outlook.com]
> 2. Check if we're hitting Cisco ASA bug
> (<https://quickview.cloudapps.cisco.com/quickview/bug/CSCuv00272>) Taken from this page -
> <https://community.cisco.com/t5/firewalls/asa-policy-based-routing-in-a-context-9-4-2/td-p/2831294>
>
>
> Webex: <https://jll.webex.com/join/Andrew.Fieldeu.jll.com>
>
> Call details:
> UK - 02034333608 / 08082389692
> Other countries: <https://www.tcconline.com/listNumbersByCode.action?confCode=3861548499#>
> <<https://www.tcconline.com/listNumbersByCode.action?confCode=3861548499#>>
> Passcode: 3861548499#
>
>
> <C3730065.PNG>
> <meeting.ics>

EXHIBIT – 20

Asad Gilani

From: Brett Ayres
Sent: Friday, January 25, 2019 7:48 AM
To: Asad Gilani
Cc: Roumen Doukov; Ramin Modjtabai
Subject: RB - SD-WAN RFP - Cisco Viptela
Attachments: Minimum contract terms - software licensing.docx; SD-WAN RFP v4.0_final.docx; RB RFP SD WAN Requirements_vendor completion template_v2.0.xlsx; RB SD-WAN Solution Requirements assessment ver. 0-60 05-12-18.docx

Hi Asad

Thank you for your help on this one.

Please can you work on answering the questions in the excel "RB RFP SD-WAN Requirements" that relate to the technology (Viptela) and work on a BoM for Viptela.

Please can you work with Rouman on an estimate for effort hours on the design and migration for Pilots and Main project – Roumen has a really good tool for this.

I will setup a call for Wednesday morning (US time) for a catch up.

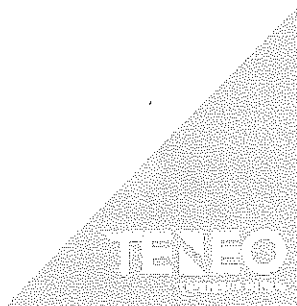
Please let me know if you have any questions, as we don't have long here.

Thanks
Brett

BRETT AYRES

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EXHIBIT – 21

Asad Gilani

From: Brett Ayres
Sent: Wednesday, January 23, 2019 4:36 AM
To: Asad Gilani
Cc: Tom Weston
Subject: FW: WFW
Attachments: VZ Notes.txt; VZ Classes1.xlsx; L3 Notes.txt; L3 Classes.xlsx

Hi Asad

I need your help to with this to get it completed.

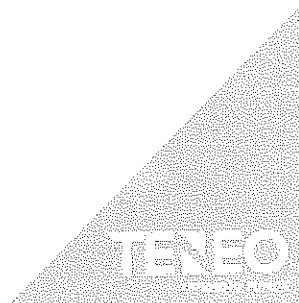
Please can you give me a call when you're online this morning and we can discuss.

Thanks
Brett

BRETT AYRES

Global SD WAN Practice Director
RCSP-NPM, RCSA-HCB, RCSA-APM

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From: Tom Weston
Sent: 23 January 2019 09:24
To: Brett Ayres <BAyres@teneo.net>
Subject: RE: WFW stuff?

Sorry,

Attached

EXHIBIT – 22

Asad Gilani

From: Brett Ayres
Sent: Friday, January 18, 2019 7:59 AM
To: Asad Gilani
Cc: Roumen Doukov; Ramin Modjtabai; Adam Start; Marc Sollars
Subject: FW: SD-WAN RFP
Attachments: Vendor Q&A and compliance record.xlsx; RFP Term Sheet Category A Final template_JW 15 10 18.docx; Minimum contract terms - software licensing.docx; SD-WAN RFP v4.0 _final.docx; RB SD-WAN Solution Requirements assessment ver. 0-60 05-12-18.docx

Hi Asad

I would like to have you work with us on this RFP.

We have been working with RB for a number of years and Roumen has just completed a requirements assessment and vendor selection bit of work with them (See attached). We are in the process of building a list of questions related to the requirements in the RFP – We would be bidding with Viptela and VeloCloud (As the customer requires TWO vendor product solutions).

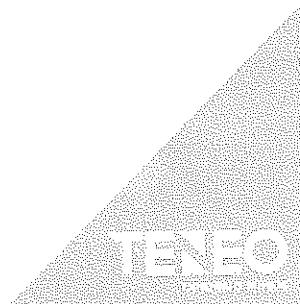
Please can you review the attached RFP information and come back to me with a list of questions for RB by 9am (UK Time) Tuesday Morning. I am free later today if you have any questions.

Thanks
Brett

BRETT AYRES

Global SD WAN Practice Director
RCSP-NPM, RCSA-HCB, RCSA-APM

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EXHIBIT 23

Asad Gilani

From: Adam Start
Sent: Friday, March 22, 2019 12:55 PM
To: Colin Smith
Cc: Asad Gilani
Subject: RE: 118118 Money Meraki Rep and Dropbox

Hi Colin

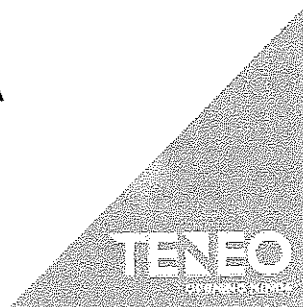
Thanks for sending this through 😊

@Asad – please upload the bandwidth detail collection doc ASAP

Cheers
Adam

ADAM START SD-WAN Sales Lead EMEA

direct: +44 118 402 3615
mobile: +44 7881 313 623
email: AStart@teneo.net
web: www.teneo.net



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TAKE OUR SD-WAN WORKSHOP

*De-risk your SD-WAN project by choosing the right
technology, deployment and delivery model.*

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From: Colin Smith <Colin.Smith@118118money.com>
Sent: 22 March 2019 16:53
To: Adam Start <AStart@teneo.net>
Subject: 118118 Money Meraki Rep and Dropbox

Hi Adam,

Below is the link for Dropbox

EXHIBIT 24

Asad Gilani

From: Adam Start
Sent: Friday, June 14, 2019 7:01 AM
To: Asad Gilani
Subject: RE: Availabilities for Staubli

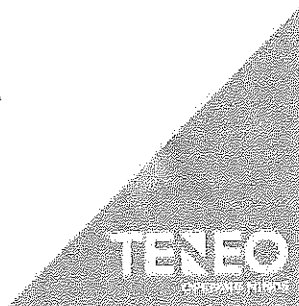
Hi Asad

Due to issues with Staubli wanting to work with a local French speaking partner, SP and Teneo have decided this is not an opportunity we are going to pursue together. Thanks for the offer of help, which we will use on another opportunity when it arises.

Cheers
Adam

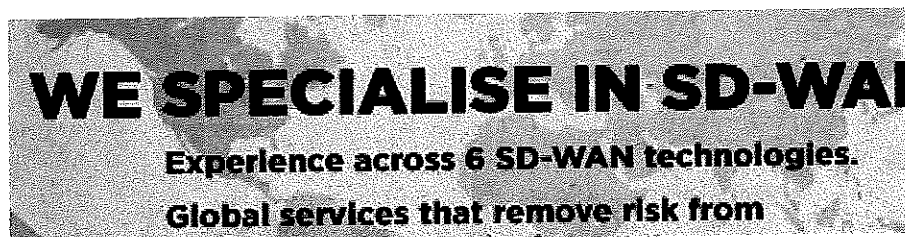
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From: Adam Start
Sent: 12 June 2019 09:44
To: Jerome Sarrasin <JSarrasin@teneo.net>
Cc: Asad Gilani <Asad.Gilani@teneo.net>
Subject: RE: Availabilities for Staubli

Hi Jerome

If Asad is on leave for the first week of July, then the answer is simple – we cant do this until the 2nd week of July. End of story. We have no other options.

Cheers
Adam

From: Jerome Sarrasin
Sent: 12 June 2019 09:21
To: Adam Start <AStart@teneo.net>
Cc: Asad Gilani <Asad.Gilani@teneo.net>
Subject: Availabilities for Staubli

Hi Adam,

Just before getting back to Staubli, could you confirm what are our availabilities for working with Silver Peak on their lab?

@Asad, you told me on Monday, you were on holidays between the 1st of July, and the 5th of July, whereas SP are available.

On the Staubli side, they will have other lab with Citrix and Riverbed during the 2nd half of June. So they expect indeed to get the SP lab the first week of July.

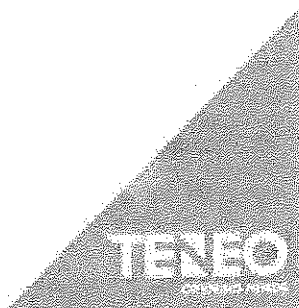
So how (and when) could we synchronise with SP, given that SP Silver Peak consider we don't have to wait any longer for doing the lab?

Kind regards,

Jérôme

JEROME SARRASIN
Sales Executive

direct: +33 1 55 51 30 38
mobile: +33 6 14 41 39 68
email: JSarrasin@teneo.net
web: www.teneo.net



65 Rue Des Trois Fontanot, 92000 Nanterre, France

Notre politique de confidentialité

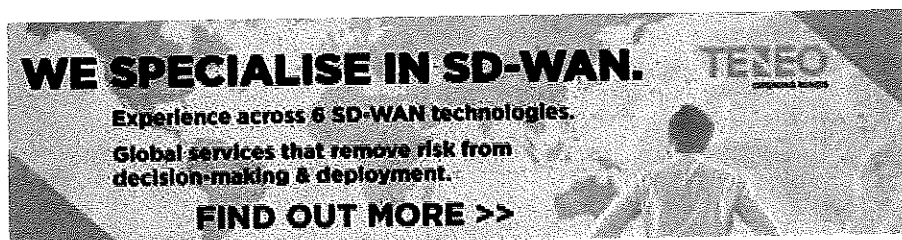


EXHIBIT 24

Asad Gilani

From: Asad Gilani
Sent: Thursday, June 20, 2019 1:18 PM
To: Rachel Head
Cc: asad.s.gilani@gmail.com
Subject: FW: Versa / Riverbed / Teneo

Rachel,

I am brining Riverbed/Versa opportunities to Teneo and message Steve Evans or is giving out is very different I just cannot believe it.

From: Asad Gilani
Sent: Thursday, June 20, 2019 1:17 PM
To: Patrick Flanagan <Patrick.Flanagan@riverbed.com>; Gary Marsh <Gary.Marsh@riverbed.com>; Steve Evans <Steve.Evans@teneo.net>
Cc: Brent Smith <Brent.Smith@riverbed.com>; Drew Arnold <Drew.Arnold@riverbed.com>; Torey Fox <Torey.Fox@riverbed.com>; Brett Ayres <BAyres@teneo.net>
Subject: RE: Versa / Riverbed / Teneo

Patrick –

Sure Patrick have a call. Let me know when

From: Patrick Flanagan [<mailto:Patrick.Flanagan@riverbed.com>] **Sent:** Thursday, June 20, 2019 12:38 PM

Thanks Asad! Would you be open to sharing some of your real-world Versa tips/tricks and experiences on a call with the Riverbed SE team? It would be a huge help to our field team, as well as position Teneo to be a partner of choice in some new opportunities with Versa.

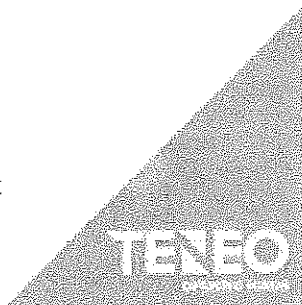
From: Asad Gilani <Asad.Gilani@teneo.net>
Sent: Thursday, June 20, 2019 12:11:28 PM
To: Gary Marsh; Patrick Flanagan; Steve Evans
Cc: Brent Smith; Drew Arnold; Torey Fox; Brett Ayres
Subject: [EXTERNAL] RE: Versa / Riverbed / Teneo

Gary,

Thanks. I know Drew Arnold did the Boot Camp training ?

ASAD GILANI
Solutions Architect

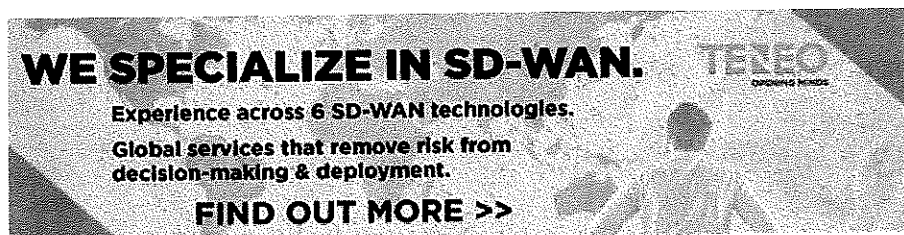
direct: +1 914 314 1799
email: Asad.Gilani@teneo.net
web: www.teneo.net





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From: Gary Marsh [<mailto:Gary.Marsh@riverbed.com>] **Sent:** Thursday, June 20, 2019 12:07 PM

+Asad

Gary Marsh
Technical Solutions Architect
Cloud Infrastructure Center of Excellence
Riverbed Technology
Mobile: 615.418.8627
Email: Gary.Marsh@riverbed.com
[Linkedin - Twitter](#)
www.riverbed.com

riverbed

The Digital Performance Company

From: Patrick Flanagan <Patrick.Flanagan@riverbed.com>

Date: Thursday, June 20, 2019 at 9:56 AM

To: Steve Evans <steve.evans@teneo.net>

Cc: Gary Marsh <Gary.Marsh@riverbed.com>, Brent Smith <Brent.Smith@riverbed.com>, Drew Arnold <Drew.Arnold@riverbed.com>, Torey Fox <Torey.Fox@riverbed.com>

Subject: Versa / Riverbed / Teneo

Hi Steve,

Hope you're doing well! I moved up to Richmond a few months ago-- we should grab lunch one day when we're both in town.

I am leading a new center of excellence team focused on cloud infrastructure (SD-WAN, optimization) and wanted to pick your brain about how we can go to market together and do some shared enablement with Versa. Definitely interested in you and your team's real world experience with the solution and any advice you might have. Gary brought up that Asad and your team have some certifications there already.

We're going to an initial training session next week to meet with the Versa team and start getting ramped. Let us know if there are any topics that we could bring up on Teneo's behalf with them, and how our team (Gary, Brent Smith out of Texas) can help you.

Looking forward to working closely with Teneo on this!

Patrick Flanagan
Cloud Infrastructure Center of Excellence
Riverbed Technology
404-386-1695



From: Patrick Flanagan <Patrick.Flanagan@riverbed.com>
Date: Friday, June 21, 2019 at 9:46 AM
To: Gary Marsh <Gary.Marsh@riverbed.com>, Gary Pugh <Gary.Pugh@riverbed.com>, Brent Smith <Brent.Smith@riverbed.com>, Torey Fox <Torey.Fox@riverbed.com>, Asad Gilani <Asad.Gilani@teneo.net>
Cc: Brett Ayres <BAyres@teneo.net>
Subject: Intro / discuss Versa call

Hi all,

Let me know if this time works. A brief discussion about having Asad present to Riverbed SE's on Versa. This is just a prep call.

Thanks,

Patrick

EXHIBIT 25

Asad Gilani

From: Brett Ayres
Sent: Friday, June 21, 2019 8:21 AM
To: Patrick Flanagan
Cc: Asad Gilani; Steve Evans
Subject: Call about Versa

Hi Patrick

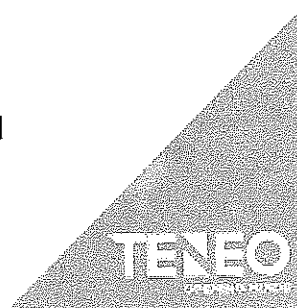
Asad is off sick today so unfortunately we will need to postpone this call.

Thanks
Brett

BRETT AYRES

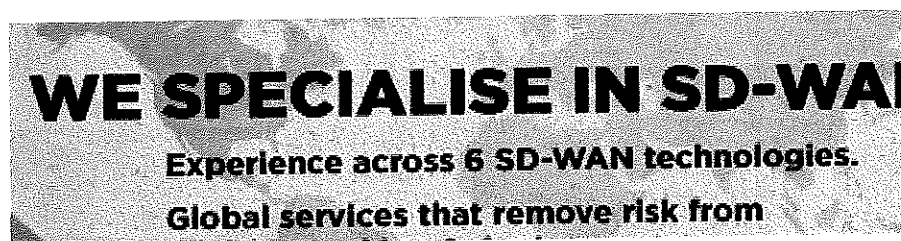
Global SD WAN Practice Director
RCSP-NPM, RCSA-HCB, RCSA-APM

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EXHIBIT 26



Asad Gilani <asad.s.gilani@gmail.com>

FW: Announcement - New Starters

Rose.Neas@teneo.net <Rose.Neas@teneo.net>

Thu, Sep 22, 2016 at 11:23 AM

To: "asad.s.gilani@gmail.com" <asad.s.gilani@gmail.com>

Hi! ☺

From: Rachel Head**Sent:** Thursday, September 22, 2016 11:11 AM**To:** GLOBAL - All Staff <GLOBAL-AllStaff@internal.teneo.net>**Subject:** Announcement - New Starters

I am pleased to announce the appointment of 3 new starters to sales and technical positions in the USA.

Matt Madison joins us as a Sales Support Representative, based in the Richmond office, on 23rd September. Matt is a marketing graduate of James Madison University and has previously held roles in sales, marketing and operations. Most recently he was an Advertising Operations Manager with Media General.

Charlie Seitz and **Asad Gilani** are both starting on 26th September as Solutions Engineers. Charlie will be based in Florida and work alongside Caroline Pino and Asad will support newly appointed Rose Neas in the New York Metro area. Immediately prior to joining Teneo, Charlie was the owner and chief consultant of CyberSafety Net, Inc., an IT and corporate security consulting firm and previously held a number of Security consultant and analyst roles. He has a B.A. in Anthropology from Wake Forest University, Winston-Salem, NC. Asad held a number of technical and management positions at companies such as Morgan Stanley and Bank of America and has a B.A. in Computer Information and an M.S in Telecommunications from Iona College, New Rochelle.

Please join me in warmly welcoming Matt, Charlie and Asad to Teneo

RACHEL HEAD**Chief Operating Officer****direct:** +44 118 402 3655**mobile:** +44 7710 844 548**email:** RHead@teneo.net